



WEST HEATH SCHOOL SINGLE EQUALITY PLAN 2019 – 2021

Adopted: June 2019

Annual Review Date: June 2021

West Heath School is dedicated to ensuring that all members of the school community and the wider community are treated equally, fairly, and with respect by the school and by each other. This applies to the school as a place of education, a business, and an employer. Prejudice, discrimination (direct or indirect), and victimisation are not tolerated, and we work hard to instil in our students a strong understanding of right and wrong, including the importance of inclusion, acceptance, and compassion towards others. The school's main priority is to provide the best education and care that we can and establish a cooperative working relationship between home and school, so as to aid the development, progress, and needs of all the children in our care.

This plan sets out how the school will satisfy its duties under the Equality Act to eliminate all discrimination, harassment, victimisation and any other behaviour prohibited by the Equality Act 2010, to foster good relations between persons with and without protected characteristics and promote equality of opportunity regardless of whether a person has a protected characteristic (such as race, gender, transgender, disability, age, pregnancy and maternity, religion or belief and sexual orientation). The school aims to comply with this duty, in both the delivery of its services and the employment of its staff. It is created in line with the Equality Act 2010 and is the foundation of all the school's other policies – particularly the **special educational needs policy**, **admissions policy**, **anti-bullying policy** and the **behaviour policy** which can be found on the school's website/staff intranet.

Through the creation of this equalities plan, we have been able to develop a better understanding of what the challenges to equality are within the school and how we can best deal with these. The current summary of equality-based actions being undertaken by the school is set out in annex A. This document will be reviewed annually, or any time there is an update or change to equality legislation, to ensure that it is being effectively implemented and remains focused and up to date on issues surrounding equality both within the school and nationally.

West Heath School Sevenoaks geographic area profile

Sevenoaks District has a population of 117,800 living in 47,020 households. The Office for National Statistics says that the districts population will increase by 13,000 more people by 2026.

Disability

The 2011 Census recorded that 13,404 households (28.5%) in the District include people with a long-term health problem or disability. Of these, 2,651 households (5.6%) include two or more people with a long-term health problem or disability. 17,091 people (14.9%) in the District have their day to day activities limited a little or a lot by a long-term illness or disability. This is lower than the Kent average of 17.6% and lower than the national average of 17.9%. The percentage of people with a disability remains similar to that recorded in the 2001 Census.

Age

The average age of the District's population is 41.7. This is slightly higher than the Kent average of 40.7 years and the national average of 39.6 years. 20.6% of the District's population was aged over 65. This has increased from 17.2% in 2001. Population forecasts suggest that 28% of the District's population will be aged over 65 by 2033. This is in line with population forecasts for the Kent area.

Sex (gender)

51.6% of the population is female and 48.4% is male. There has been little change in these proportions since the 2001 Census.

Race

The 2011 Census said that 4,864 people (4.2%) in the District are from a Black and Minority Ethnic background. This is lower than the Kent average of 6.9% and the national average of 14.6%. The largest ethnic minority group is 'other white' representing 3.6% of the population in the District. The percentage of people in the District from a Black and Minority Ethnic Background has increased by 2.8% (2,957 people) since 2001.

Religion or belief

The 2011 Census said that 65.4% of the population is Christian. This has decreased by 10.7% since 2001 but is the highest amount of any district in Kent and higher than the national average of 59.4%. 25.2% of the population have no religion. Small proportions of the remainder of the population are Muslim, Buddhist, Hindu, Sikh and Jewish.

Sexual orientation

Data from the Integrated Household Survey estimates that 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual.

Pregnancy or maternity

There are 64.3 births per 1,000 of the population. This is higher than the Kent average of 62.4 and the national average of 62.1. There has been an average of 1,271 births in the district, per year, over the past 34 years. In 2014, there were 1,298 births.

Marital or civil partnership status

The 2011 Census recorded that 54.5% of the District's population are married. This is higher than the Kent average of 48.9% and the national average of 46.6%.

Gender reassignment

At present, there is no official estimate of the Trans population. Gender reassignment data is not captured by the Census.

West Heath School profile

West Heath School profile is set out in Annex C. At the time of writing in June 2019, the school's community is already diverse with a population of 321 people including students and staffs. The 321-school population comprises of 190 staffs (59.2%) and 131 students (40.8%).

At the time of writing in June 2019, the school's community continues to strive for improvement in terms of its diversity. The school's recruitment policies continue to have a positive impact on the black and minority ethnic (BME) profile of the school with 22 out of 131 (16.8%) students and 5 out of 190 (3%) staff coming from black or minority ethnic groups compared with the largest ethnic group of 'white/other whites' representing 112 out of 131 (85.4%) students and 185 out of 190 (97%) staff of the population in the school community.

All our 131 students have varied diagnosis. The school primary area of need for female students is identified as 3.1% (cognitive & learning), 13% (communication & interaction) and 15.3% (social, emotional and mental health) in comparison to the male students primary area of need of 3.1% (cognitive & learning), 32.3% (communication & interaction) and 33.6% (social, emotional and mental health). To find out more on the different types of disabilities we support, please visit our website or read our Education, Therapy and Care – Statement of Purpose.

In terms of our staff, we only have 1 (0.5%) staff out of the 190 recorded as having a disability with the majority of staff not having a long-term health problem or disability.

The school's gender profile is predominantly female for staff and male for students. The school has 138 female staff (73%) compared to 52 (27%) male staff. There are 89 (67.9%) male students compared to 42 (32.1%) female students.

Our Mission Statement: *"REBUILDING LIVES THROUGH EDUCATION"*

To support and empower our community to discover their strengths by taking responsibility for their lives, through respect for themselves and others

Our Values:

Integrity and Trust

To be consistent in approach, to do the things we say we will, being honest and open about our approach and practice

Respect

Of ourselves and those around us, showing unconditional positive regard to opposing views and beliefs of others

Responsibility

To understand our role and the role of others, to self-reflect and aspire to be the best we can

Optimism

To look toward goals with a positive and unwavering approach, always seeing the best in others and in their actions

Commitment

To do our utmost to support our community in meeting the challenges we face collectively and as individuals

Independence

To be able to think independently, to have self-understanding and self-belief

Empowerment

To be able to make informed choices; to have the ability to take control of internalised thought, approach and actions

Roles and responsibilities

Creating a school environment that promotes equality and denounces discrimination is a whole-school responsibility and requires all members of the school community to be actively involved in breaking down barriers to learning and barriers to social and emotional development that prejudice can create.

Individuals in the school are expected to take responsibility for supporting and promoting equality in school above and beyond the responsibilities listed below. The Assistant Head of Residential Care has the day-to-day responsibility for coordinating the implementation of this scheme.

The Trustees

The Trustees will:

- approve this document and ensure that it is adopted correctly throughout the school
- ensure the school complies with all equality legislation and the school's equality objectives
- monitor and evaluate the effectiveness of the equality plan on a regular basis and make any amendments to improve on the plan when and where necessary
- nominate a named Trustee to oversee the implementation of the equality plan, monitor equality outcomes, and regularly report back to the rest of the governing body
- ensure that parents are informed of any incident related to this scheme which could directly affect their child
- report to parents, carers, and the wider community on the progress of the school's equality plan through the school prospectus, the school website, and the school's annual report

The Principal and Senior Leadership Team

The Principal, with the support of the rest of the senior leadership team, will:

- promote the single equality plan both within the school and externally to the rest of the community
- ensure that all staff are aware of their role and responsibilities regarding the promotion and delivery of equality in school
- report back to the trustees on how the plan is working and any amendments that they feel should be made, as well as feedback from staff, students and parents
- challenge inappropriate language and behaviour
- tackle bias and stereotyping
- take appropriate action where discrimination or victimisation occurs

Staff

School staff will:

- ensure that they are up to date and aware of the contents of this plan and the school's policy towards all types of discrimination
- challenge inappropriate language and behaviour
- tackle bias and stereotyping
- work to promote anti-bullying strategies as outlined in the school's **behaviour and anti-bullying policy**
- show a commitment to undertake development and training within this area
- engage with the school in eliminating any discrimination and act as a good example to students
- promote a positive working environment
- report back to their managers immediately on any incidents relating to discrimination or victimisation, either by staff, students, or any other member of the school community, so that these incidents can be reviewed, and action taken where necessary

Students:

Students at the school will:

- engage with the school in eliminating any discrimination
- promote a positive work environment and a positive attitude towards equality when both in school and off the school site
- report to school staff any incidents of inappropriate language or behaviour, discrimination or victimisation that they know to have occurred
- work to promote the anti-bullying strategies outlined in the school's **behaviour and anti-bullying policy**
- set a good example regarding behaviour and social awareness to younger students and their peers

Parents, carers, and visitors

Parents, carers, and visitors to the school are expected to:

- familiarise themselves with the school's single equality plan and support the scheme by promoting a positive attitude towards equality at home
- attend any relevant meetings/awareness-raising sessions that they are invited to relating to the school's equality plan
- work with the school to resolve any incident relating to discrimination or victimisation that their child is involved in
- respect and follow our equality plan when visiting the school

Events

- Events are arranged to ensure that all families may become involved in the life of the school if they wish
- Information about events and meetings is communicated in a variety of ways (e.g. electronically, written and verbal), to ensure that all Parents / legal guardians have information about, and access to, the meetings

Key groups at risk

Whilst the school recognises that any person or group of people can become victim to discrimination, victimisation or unfair treatment, people may be more at risk of becoming victims of inequality due to:

- **Race**
- **Disability**
- **Gender and transgender**
- **Religion or belief**
- **Sexual orientation**

Community cohesion

The school expects all its students and staff to act respectfully towards members of the wider community that the school is part of.

Inclusion

Promoting and practising inclusion in school lessons, around the school site, during all school activities and into the wider community is a key part of developing a positive attitude towards equality and people from different backgrounds. You can find more information regarding our provision for and policy on inclusion for SEN in the school's **Special Educational Needs and Disabilities (SEND) Policy**

Student voice

We pride ourselves on being a "listening" school and the **Complaints, Concerns, Suggestions & Compliments Policy** makes clear how a parent, carer or student can raise a concern, make a complaint, give a compliment or make a suggestion. Through our support of student voice, we encourage our students to have confidence in voicing their opinions and taking responsibility for the world around them. It is important that we teach our children how to engage in mature social interactions and get along with a variety of different types of people. This is developed through student voice by interactions between students from different year groups, students and staff, and students and the wider community.

We also have a school/boarded student council which meets at least half termly. These meetings ensure that our students can actively contribute to the management and running of our school. Additionally, we have appointed the services of an independent visitor who conducts Standard 20 visits to the boarding houses. A regular feature of such visits involves the visitor listening to young people describe their experiences of school. The intention is to ensure that no student, having a need to make a representation or complaint feels unable to do so.

Recruitment

West Heath School is committed to providing equality of opportunity for all and ensuring that all stages of recruitment and selection are fair. Recruitment and selection procedures will be reviewed on a regular basis to ensure that applicants are not discriminated against on the grounds of race, nationality, gender, religion, age, disability, marital status, pregnancy and maternity or sexual orientation. West Heath School acknowledges that unfair discrimination can arise on occasion and

so will ensure that the equal opportunities policy outlined in this plan is the foundation for all its activities.

Where a candidate is known personally to a member of the selection panel it will be declared before shortlisting takes place. It may then be necessary to change the selection panel to ensure that there is no conflict of interest and that equal opportunities principles are adhered to.

More information about our recruitment procedures can be found in the school's **recruitment policy**.

Staff

Equal opportunities for staff

As part of our commitment to the implementation of equal opportunities principles and the monitoring and active promotion of equality in all aspects of staffing and employment, the school will ensure that:

- all staff appointments and promotions are made on the basis of merit and ability and in compliance with the law;
- staffing of the school reflects the diversity of our community wherever possible;
- as an employer we strive to ensure that we eliminate discrimination and harassment in our employment practice and actively promote equality across all groups within our workforce including the duty to make reasonable adjustments;
- we respect the religious beliefs and practice of all staff, students and parents, and comply with reasonable requests relating to religious observance and practice;

Staff Training

All staff at West Heath School will have their professional development needs met in relation to this Single Equality Plan. This includes staff across all sections (teaching, residential care, therapy staff, office/admin staff, maintenance staff, catering team, cleaners, wedding and event etc) and support that will be provided to meet their training needs.

New and temporary staff will be made aware of our Equality and Diversity Policy, Single Equality Plan and other practices in relation to this.

- We seek out training opportunities for staff and volunteers to enable them to develop anti-discriminatory and inclusive practices, which enable all students to flourish

Staff discipline and suspension

West Heath School is committed to ensuring that all school staff are treated fairly and consistently and anyone not adhering to these values is held to account through our **staff discipline, conduct, and grievance policy which can be found in pages 20-31 of the staff handbook**.

The education and wellbeing of our students is our main priority. Any member of staff who creates a barrier to learning for our students will be disciplined. The school's **staff appraisal policy** provides more information on how the school monitors staff performance. We hope that staff will feel confident to voice complaints and grievances in the confidential environment of the school and that they will trust the school to deal with their grievances fully, promptly, and fairly. The school puts

great faith in all its employees and hopes never to have to discipline anyone as a result of misconduct.

Behaviour, exclusions and attendance

The school's **behaviour policy** takes full account of the duties under the Equality Act. We make reasonable, appropriate and flexible adjustments for students with special educational needs and disabilities. We closely monitor data on exclusions and absence from school for evidence of over-representation of different groups and will take action to address any concerns that arise in this area.

Read our school **attendance, behaviour and exclusions policies** for more information on the processes surrounding these topics.

The curriculum

The curriculum offered at West Heath School encourages children to develop positive attitudes about themselves as well as to people who are different from themselves. Equality and diversity are embedded as far as possible in all areas of the curriculum and students are given opportunities to explore prejudice and discrimination, and to positively explore difference in relation to race/ethnicity, religion/belief, gender, disability.

It should detail

We do this by:

- Making the students feel valued and good about themselves through the curriculum
- Ensuring that the students have equal access to learning
- Recognising the different learning styles of the students, making appropriate provision within the curriculum to ensure each student receives the widest possible opportunity to develop their skills and abilities
- Regularly reviewing the teaching within each subject area as well as with the resources that are available to support this so that both the diversity of the school, local community and wider society as a whole are represented in this
- Avoiding stereotypes or derogatory images in the selection of books or other visual materials
- Celebrating a wide range of festivals, for example, Humans Rights Day, Holocaust Memorial Day, Chinese New Year, Safer Internet Day, Zero Discrimination Day, Shrove Tuesday, International Women's Day, International Men's Day, World Autism Awareness Day, Ramadan, Black History Month, Father's Day/Mother's Day, USA Independence Day, International Day for Peace, Anti-Bullying Week, World Aids Day etc.
- Creating an environment of mutual respect and tolerance
- Helping the students to understand that discriminatory behaviour and remarks are hurtful and unacceptable
- Ensuring that the curriculum offered is inclusive of students with special educational needs and children with disabilities
- Data is collected with regard to the attainment and achievement of all students in order to inform the planning and provision of support to individuals and groups of students
- We recognise the specific assessment needs of students with additional needs such SEN and also the importance of scrutinising assessment materials for cultural bias

Food and Dietary Needs

- We work in partnership with Parents / legal guardians to ensure that the medical, cultural and dietary needs of students are met as far as is reasonably possible
- We will work in partnership with the school catering manager to help students to learn about a range of cultural food, and of cultural approaches to mealtimes and eating, and to respect the differences among them.

Monitoring and review

The **Equality and Diversity Monitoring Group** is responsible for overseeing developments in the area of Equality & Diversity to ensure that the school works to advance the principles of equal opportunities and diversity. One of the functions of the Equality and Diversity Monitoring Group will be analysing anonymous data collected about the school to look for differences between groupings. Where gaps are identified by the Equality and Diversity Monitoring Group, this would help in exploring the issue further and developing strategies and target resources to close the gaps and reduce inequalities within the school.

The group will be chaired by the Assistant Head of Residential Care and will comprise of representatives from across the school (Teaching and Learning, Human Resources Manager, Strategic Head of Staff Development, Data Analyst & Curriculum Support and Events & Marketing Manager) and will meet termly and will submit recommendations to the Executive Leadership Team/Trustees.

The specific duties of the group will be:

- To monitor progress of the school's Single Equality Plan
- To review student enrolment statistics to identify trends relating to students with protected characteristics
- To review success rates of different student groups to determine any underperforming groups and to ensure how any achievement gaps will be addressed
- To review all new school policies, procedures, documentations & forms, systems, projects, marketing and services to prevent unfair discrimination.
- To receive summary reports on discriminatory complaints, incidents and compliments to identify any issues relating to Equality and Diversity, including the characteristics of students submitting complaints, incidents and compliments
- To work with The Strategic Head of Staff Development to ensure that appropriate training and development relating to Equality and Diversity is available, including PREVENT and other initiatives
- To review Marketing materials, including the website and to make recommendations on accessibility for all student groups
- To review the workforce profile on an annual basis (including recruitment statistics)

Information will be gathered through:

- identification of children and young people, parents, carers, staff and other users of the school representing the different protected characteristics. This helps us develop and monitor the scheme. Comprehensive and sensitive efforts are made to collect accurate information and meet security of information requirements, in addition to our duty to secure accurate information relating to ethnicity and first language;
- student attainment and progress data relating to different groups;
- children's views, actively sought and incorporated in a way that values their contribution;
- information about how different groups access the whole curriculum and how they make choices between subject options;
- sports and activities choices of all groups;
- uptake of the extended school offer by group;
- exclusions data analysed by group;
- records of bullying and harassment on the grounds of any equality issue;
- data on the recruitment, development, and retention of employees;
- outcomes of activities promoting community engagement and community cohesion;
- outcomes of actions taken to secure the involvement of parents and others who have been identified as difficult to engage

The Group will provide termly **monitoring reports** for review by the Senior Leadership Team and Trustees. These will include:

- progress against targets relating to equality and future plans
- school population
- recruitment and retention
- key initiatives

Outcomes

One of the most important indicators of how successful we are as a school in promoting equality and eliminating discrimination are the outcomes for various individuals and groups. Where robust analysis of outcomes reveals poorer outcomes for any particular groups, an impact assessment will be carried out and an action plan put in place to aid these outcomes. Action plans will outline:

- objectives and specific actions to be taken
- expected impact and indicators of achievement (success criteria)
- clear timescales
- who has lead responsibility
- resource implications
- specified dates for review

Equality impact assessments

As a school, we will carry out equality impact assessments on all new policies, procedures, projects and services, to prevent unfair discrimination. This is set out in Annex B. The equality impact assessment focuses on 9 areas:

age
disability
faith

sex
sex reassignment
marriage and civil partnership
pregnancy and maternity
race
sexual orientation.

An equality impact assessment should be used to anticipate and identify the impacts of new policies, procedures, projects or services on these areas.

The Equality and Diversity Monitoring Group should then make sure that any potential negative consequences are removed or balanced out by either changing the policy, procedure, project or service or introducing other measures alongside it.

Reporting on our progress

This single equality plan will be reviewed annually, unless there is specific reason for it to be reviewed earlier (for example an incident involving members of the school community or new legislation). Trustees will review how effective it is in tackling discrimination, promoting access and participation, equality and good relationships between different groups, and that it does not disadvantage particular sections of the community. Trustees will also review evidence that it is being put into practice in school by staff and students, and whether there is any need for extra training or development sessions across the whole school to ensure it is promoted and implemented as much as possible.

Signed by:

Chair of Trustees

Date:

Principal

Date:

This document will be reviewed:

- at regular intervals (*recommended review period is annually*)
- after incidents that relate to, or impact on, equality in school
- after any significant changes to workplace, working practices or staffing

ANNEX A

Equality & Diversity - Action plan 2019 – 2021

Priorities:

- Publish and promote single equality plan on website etc.
- Policy reviews within the new Equality Impact Assessment (EIA) Initial Screening
- Review and update the school website which represent a school and the website demonstrate equality, diversity and inclusion of students and staff.
- Human Resources are to improve collating data on staff profile on the 9 protected characters set out in the Equality Act 2010. The current profiling data is unsatisfactory for the size of the school.
- Data Analyst & Curriculum Support Lead is to provide data on students' profile on the 9 protected characters set out in the Equality Act 2010.
- Strategic Head of Staff Development to ensure all staff (including catering, cleaners, admin staff, maintenance, events & maintenance) have all mandatory trainings, for example, Equality & Diversity, Safeguarding, Child Protection, SEND Code of Practice, All GDPR trainings etc and provide the training data at each Equality and Diversity Monitoring Group meeting.
- Performance data required from Student and parents' feedback/surveys.

Action/ Objectives	By Whom	Reviews/Timeframes
Review and update the school website which represent a school and the website demonstrate equality, diversity and inclusion of students and staff.	Vice Principal for Teaching and Learning (Curriculum) Events & Marketing Manager	December 2018.
Publish and promote single equality plan on website etc.	Headteacher ELT SSC Equality and Diversity Monitoring Group	Ongoing with review after survey
Monitor and analyse pupil achievement by age, race, gender and disability and act on any trends or patterns in the data that require additional support for students	Head teacher / Governing body Data Analyst & Curriculum Support Vice Principal for Teaching and Learning (Curriculum)	September 2019.
Human Resources are to improve collating data on staff profile on the 9 protected characters set out in the Equality Act 2010. The current profiling data is unsatisfactory for the size of the school.	HR Manager	September 2019.

All students have induction that includes Equality and Diversity and promotes social cohesion – curriculum to embed Equality Diversity in teaching and learning	Vice Principal for Teaching and Learning (Curriculum)	September 2019
The school catering department are to take part in annual national equality & diversity and inclusion events and festivals (for example Ramadan, Black History Month, Chinese New Year, Shrove Tuesday etc) and ensure the school menus represent such celebrations and awareness in line with the curriculum.	General Catering Manager	
Improve communication Internally/externally to raise awareness of difference	ELT SLT Middle Managers/Heads of departments Equality and Diversity Monitoring Group Strategic Head of Staff Development	
Are visual displays reflective of the diversity of your school community? How are minority ethnic, disabled and both male and female role models promoted positively	SLT Vice Principal for Teaching and Learning (Curriculum)	
As a school, we will carry out equality impact assessments on all new policies, procedures, projects and services, to prevent unfair discrimination.	Head teacher / Governing body	
The school anti-bullying policy need to make cross-reference to the Equality Act 2010.	Vice Principal Care and Safeguarding, Anti Bullying Committee and School	
All Publicity/Marketing Materials are to be reviewed and tested and Equality Impact Assessment (EIA) Initial Screening applied to ascertain if the school meet its duties under the Equality Act.	Events & Marketing Manager	

ANNEX B

Equality Impact Assessment (EIA) Guidance and Template

This document provides guidance when completing an Equality Impact Assessment (EIA). The EIA template can be found at the end of this document.

The Equality and Diversity Monitoring Group Members are committed to promoting equality and participation in all their activities, whether this is related to the work we do as a school or whether this is related to our responsibilities as an employer. As a school we are also required to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making decisions and developing policies. To do this, it is necessary to understand the potential impacts of the range of internal and external activities on different groups of people.

What is an Equality Impact assessment (EIA) and why do we need to complete one?

An equality impact assessment (EIA) is an evidence-based approach designed to help organisations ensure that their policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

The term 'policy', as used throughout this document, covers the range of functions, activities and decisions for which our school is responsible, including for example, strategic decision-making, bursary decision-making, school policies, procedures, documentations & forms, systems, projects, marketing, training, safer recruitment & job interviews decision-making, training and services to prevent unfair discrimination.

The EIA will help to ensure that:

- we understand the potential effects of the policy by assessing the impacts on different groups both external and internal
- any adverse impacts are identified, and actions identified to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning

When might I need to complete an EIA?

Whether an EIA is needed or not will depend on the likely impact that the policy may have and relevance of the activity to equality. The EIA should be done when the need for a new policy or practice/provision is identified, or when an existing one is reviewed. Depending on the type of policy or activity advice can be sought from either our HR team, our Equality and Diversity Monitoring Group, our student services committee or their equivalents.

Ideally, an EIA should form part of any new school policies, procedures, documentations & forms, systems, projects, marketing and services. It should be factored in as early as one would for other considerations such as risk, budget or health and safety.

Who is responsible for completing and signing off the EIA?

Depending on the nature of the new school policies, procedures, documentations & forms, systems, projects, marketing and services, the responsibility of who should complete the assessment, who should be consulted, and who should sign off the EIA may vary. Ultimate responsibility on whether an EIA is required, and the evaluation decision(s) made after completing the EIA lies with the Senior Responsible Officer, budget holder, project board or the most relevant Executive Leadership Team. Further advice is available from our Equality and Diversity Monitoring Group.

ANNEX B

What is discrimination?

Discrimination is where someone is treated less favourably or put at a disadvantage because of their protected characteristic. The different groups covered by the Equality Act are referred to as protected characteristics: disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, sex (gender), and age. Discrimination is usually unintended and can often remain undetected until there is a complaint. Improving or promoting equality is when you identify ways to remove barriers and improve participation for people or groups with a protected characteristic.

Building the evidence, making a judgement

In cases of new policies or management decisions there may be little evidence of the potential effect on protected characteristic groups. In such cases you should make a judgement that is as reliable as possible. Referring it to and having a consultation with the Equality and Diversity Monitoring Group will strengthen these value judgements by building a consensus that can avoid obvious prejudices or assumptions.

Consultation

Consultation with the Equality and Diversity Monitoring Group can add evidence to the assessment. Consultation is very important and key to demonstrating that organisations are meeting the equality duties, but it also needs to be proportionate and relevant. Considering the degree and range of consultation will safe-guard against 'groupthink' by involving a diverse range of consultees. These are the key considerations, to avoid over-consultation on a small policy or practice and under-consultation on a significant policy or an activity that has the potential to create barriers to participation.

Provisional Assessment

At the initial stages, you may not have all the evidence you need so you can conduct an initial EIA screening assessment. All EIA initial screening assessment forms completed should be filed away by the chair of the Equality and Diversity Monitoring Group. Where an initial EIA screening assessment has been carried out, there must be plans to gather the required data so that a full assessment can be completed after a reasonable time. The scale of these plans should be proportionate to the activity at hand. When there is enough evidence a full EIA should be prepared. Only one EIA should be created for each policy, as more evidence becomes available the initial EIA screening assessment should be built upon.

Valuing Differences

EIAs are about making comparisons between groups of staffs, students or stakeholders to identify differences in their needs and/or requirements. If the difference is disproportionate, then the policy may have a detrimental impact on some and not others.

(disproportionate difference) between groups of people in the way a policy or practice has impacted on them, asking the question "Why?" and investigating further.

ANNEX B

Evaluation Decision

There are four options open to you:

1. No barriers or impact identified; therefore, activity will **proceed**.
2. You can decide to **stop** the policy or practice at some point because the evidence shows bias towards one or more groups.
3. You can **adapt or change** the policy in a way which you think will eliminate the bias, or
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in **extreme cases** or where **positive action** is taken). Therefore, you are going to **proceed with caution** with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.

In most cases, where disproportionate disadvantage is found by carrying out EIAs, policies **and practices are usually changed or adapted**.

ANNEX B

**West Heath School
Equality Impact Assessment (EIA) Initial Screening**

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)

This policy affects or is likely to affect the following members of the school community (✓)	Students	School Staffs	Parents/Legal Guardians	Governors/Trustees	School Volunteers	School Visitors	Wider School Community

Question	Equality Protected Groups															Conclusion																
Does or could this policy have a negative impact on any of the following?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	
Does or could this policy help promote equality for any of the following?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	NS
Does data collected from the equality groups have a positive impact on this policy?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	NS
Conclusion																																

EIA Initial Screening Completed By	Date	EIA Initial Screening Approved By	Date

ANNEX B

West Heath School Full Equality Impact Assessment (EIA)

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)

This policy affects or is likely to affect the following members of the school community (✓)	Students	School Staffs	Parents/Legal Guardians	Governors/Trustees	School Volunteers	School Visitors	Wider School Community

Question	Equality Protected Groups															Conclusion																
Does or could this policy have a negative impact on any of the following?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	
Does or could this policy help promote equality for any of the following?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	NS
Does data collected from the equality groups have a positive impact on this policy?	Disability			Age			Sex (gender)			Race			Religion or belief			Sexual orientation			Pregnancy or maternity			Marital or civil partnership status			Gender reassignment			Undertake a full EIA if the answer is 'yes' or 'not sure'				
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS			Y	N	NS
Conclusion																																

Scoping Exercise - Staffs data used in this Equality Impact Assessment
 Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Schools workforce, equalities profile of students, recent surveys, research, results of recent relevant consultations, West Heath School Profile and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?

Scoping Exercise - Students data used in this Equality Impact Assessment
 This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?

**Considering the above information, what impact will this proposal have on the following groups in terms of impact on students and service delivery:
 Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex				
Gender Reassignment				
Age				
Disability				
Race & Ethnicity				
Sexual Orientation				
Religion or Belief (or No Belief)				
Pregnancy & Maternity				
Marriage and Civil Partnership				

**For your staffs/employees and considering the above information, what impact will this proposal have on the following groups:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex				
Gender Reassignment				
Age				
Disability				
Race & Ethnicity				
Sexual Orientation				
Religion or Belief (or No Belief)				
Pregnancy & Maternity				
Marriage and Civil Partnership				

Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information

Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?

Final impact analysis

Full Equality Impact Assessment Review Log

Review approved by:

Date of review

Review approved by:

Date of review

Publication

Ensure the completed Equality Impact Assessment is published in accordance with the single equality policy.

If you decide a full EqIA is required, set out the relevance of the proposal to the general equality duties and how the intended outcome would affect protected groups and move onto Stage 3. The relevance of the proposal to the general equality duties and protected groups should be set out

ANNEX B

How To Complete A Full Equality Impact Assessment Step By Step Guidance

Scoping Exercise Staffs Data

SIMS and HR could provide a whole raft of information and data that can be used in impact assessing a proposal.

Scoping Exercise - Students Data

Use this section for any changes you propose that have an impact on your service/project/policy etc. Alongside the generic data, you will also need to supply service level data. This can be quantitative (statistics) and/or qualitative (feedback, narrative), your need to consider who is impacted by your service alongside usual students i.e. who are the wider stakeholders:

- Where information does not exist within the school, consider any external information and research that may be available locally or nationally.

Service data can include:

- School equality monitoring data
- Information about key stakeholders (i.e. students and staffs)
- Complaints recorded
- Exams/qualification performance record data
- Parents and students survey/feedback results

You will need to include links to the source of this data where possible and explain what this data includes (e.g. consultation feedback disaggregated by protected characteristic)

Reasons for using different sources in Equality Impact Assessments

- To demonstrate who currently uses our school provisions
- To demonstrate the potential users of our policy, practice or provision
- To demonstrate differences in demand or use from different Local Authorities?
- To demonstrate whether the school is easy to access- and for whom
- To demonstrate what people, think of the policy, practice, service or provision?
- To demonstrate current satisfaction levels with our school.
- To demonstrate the different experiences people have trying to use our school or the different outcomes for different groups in relation to a policy or provision.

Assessment

This section can be used to analyse the impact of West Heath School employees/staffs or the students. Based on an analysis of school profile data and general data, you now need to identify how certain groups of people will be affected by the proposal:

- Does the proposal in its implementation target or exclude specific protected groups? Is this justified?
- Will the proposal in its implementation affect some equality groups disproportionately whether positively or negatively? If yes, can this be justified?
- Are there barriers to certain equality groups in the school enjoying the benefits of the proposal?
- Is the proposal likely to be equally accessed by all groups of protected characteristics or additional highlighted groups? If not, can it be justified?
- Will information about the policy, procedure, provision or project available in alternative formats (i.e. easy read formats for the students)?
- Is the policy, procedure, provision or project sensitive to the needs and cultures of the groups of protected characteristics e.g. have you considered different needs in terms of religion or belief? Have you considered different needs for particular age groups?

Initial Impact Analysis (Adverse and Differential Impact)

If the EIA shows that your proposed policy, procedure, provision or project is likely to have a disproportionate adverse impact on particular groups or directly or indirectly discriminate then you need to consider whether it complies with the statutory duties placed upon us as a school. We may need to seek legal advice. Any adverse impacts that are unavoidable must be clearly justified within the EIA. When the adverse impact is disproportionate and deemed to be unlawful, the proposed policy, procedure, provision or project must be abandoned or changed. Some policies, practices or provision are targeted at particular groups and these by definition will have a differential impact. Differential impact can be justified as part of positive action measures in relation to particular groups e.g. taking steps to address inequality due to participation by a group/s in certain activities being disproportionately low, or taking steps to address need where there is clear evidence that disadvantage experienced by particular groups is disproportionately high. Where this is the case, it is necessary to justify actions and provide a clear and legal rationale for them within the EIA.

Note: The essence of the equality duty is that we consider that in order to achieve equality you sometimes have to treat people differently. Equality does not necessarily mean treating everyone the same. For there to be true equality of outcome, the starting point and barriers individuals may face need to be taken into account to create a level playing field.

You also need to provide some narrative on your analysis. Explain your findings and how you have arrived at the decision. Consider the data and information about which our students / staffs are, considering if there is:

- A possibility of direct or indirect discrimination
- Particular disadvantages faced by some groups of people more than others
- Different needs of persons who share relevant protected characteristics
- Under representation by certain groups

- Is there an opportunity to improve relations and promote understanding?

The above must be considered as part of the initial EIA screening. You then have the opportunity to take the following actions:

Action to mitigate where you have identified a possible negative impact or where a policy/procedure may indirectly affect a group of people different, you may want to include some options to mitigate this for particular groups, for example actions could include specific measures to help certain groups of people where you have identified they may be at a disadvantage or their needs differ.

Actions to advance equality after analysing your data you may have identified that some groups experience inequality which could be helped by altering our school provision, policy or project, for example actions could include targeted advertising materials to increase students/staffs from underrepresented groups, or use communication campaigns to promote understanding.

Actions to fill gaps you may have identified that you need additional information, and as such you will need to address this, for example actions may range from further consultation with parents, staffs and students or targeted groups to implementing more consistent monitoring to ensure we know who our students are.

More information on Consultations

Consultation information or discussions with stakeholders and the Equality and Diversity Monitoring Group should be a key part of our information gathering activity. The experiences of stakeholders and the Equality and Diversity Monitoring Group and, their views are used to inform your understanding and final assessment of the impact of the proposal.

Issues to consider before undertaking consultation:

- Review results of previous consultation exercises to source any relevant data, is a new consultation necessary? Or do you have enough information from previous consultations/surveys to inform your EIA.
- Ensure that information that is used is relevant and not out of date
- Consider whether other colleagues may also be undertaking consultation and encourage joint-working arrangements.
- Decide on the focus of the consultation
- Consider whether your consultation is inclusive and caters for all groups of protected characteristics
- Appreciate that groups of protected characteristics are not homogenous in nature. For instance, you may need to consult with a number of ethnic minority communities rather than just one and provide materials in a variety of formats depending on our student needs.
- Decide on how you will consult and how much resource is available.

- Consultation methods should be appropriate to the nature of the policy, provision or project. Approaches could include focus groups or open meetings as well as interviews with certain school groups.
- Ensure sufficient time to undertake and analyse meaningful consultation.

You now need to work towards the actions you have highlighted prior to completing the remainder of the form.

Consultation and Follow up Data

Once you have completed your actions highlighted above in ‘More Information on Consultation’, you will need to provide a summary of the outcome.

Remember: Decision makers must be aware of the different needs you may have identified for people with protected characteristics, which may become evident through consultation, so that they can pay ‘Due Regard’ to the duty.

Final Impact Analysis

Your final impact analysis is important because this will allow decision makers to make their decisions equipped with knowledge of the impact on groups of people protected by law. It will identify opportunities to mitigate or advance equality and demonstrate how the needs of specific groups identified through consultation have been considered thus paying ‘Due Regard’ to their legal duties. Here you will need to explain how the decision being proposed will impact on the three ‘limbs’ of the equality duty (eliminating discrimination, harassment and victimisation; advancing equality of opportunity and fostering good relations).

Your final impact analysis should be a narrative, decision makers need to know;

- Who will be impacted, and have they been consulted? What did they say? If they were not consulted why not? Did they have a reasonable time to respond? Did consultees ask for more time to respond and were they given it? If not, why not?
- Were the consultation responses considered in the final proposal? Are they summarised/extracts included in the final report?
- How many people will be impacted and/or how significant the impact might be?
- The nature of the impact (both positive and negative) should the proposal be implemented.
- How the proposal will remove barriers to and/or advance equality
- If you intend to continue with a proposal despite negative impacts on protected groups, what are your mitigation plans?
- How you intend to monitor the impact of the proposal

You should analyse the impact of the actions identified (**at the stage of Initial Impact Analysis Adverse and Differential Impact**) and the information (**at the stage of More information on Consultations**) and explain whether the expected outcomes were achieved in practice. This analysis should also give reasons for going ahead with any proposal that may have a negative impact.

Assessment Review

New information becomes available all the time, so it is important not to draw a line after the completion of the assessment. This is why you will need add an appropriate review date for the EIA and add the assessment to your EIA review programme.

Publication

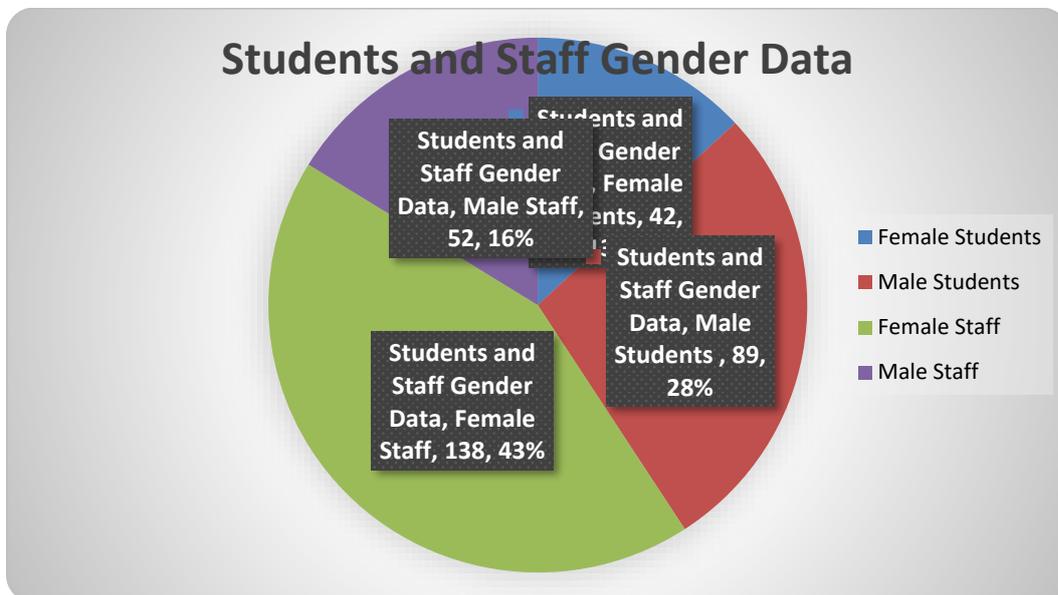
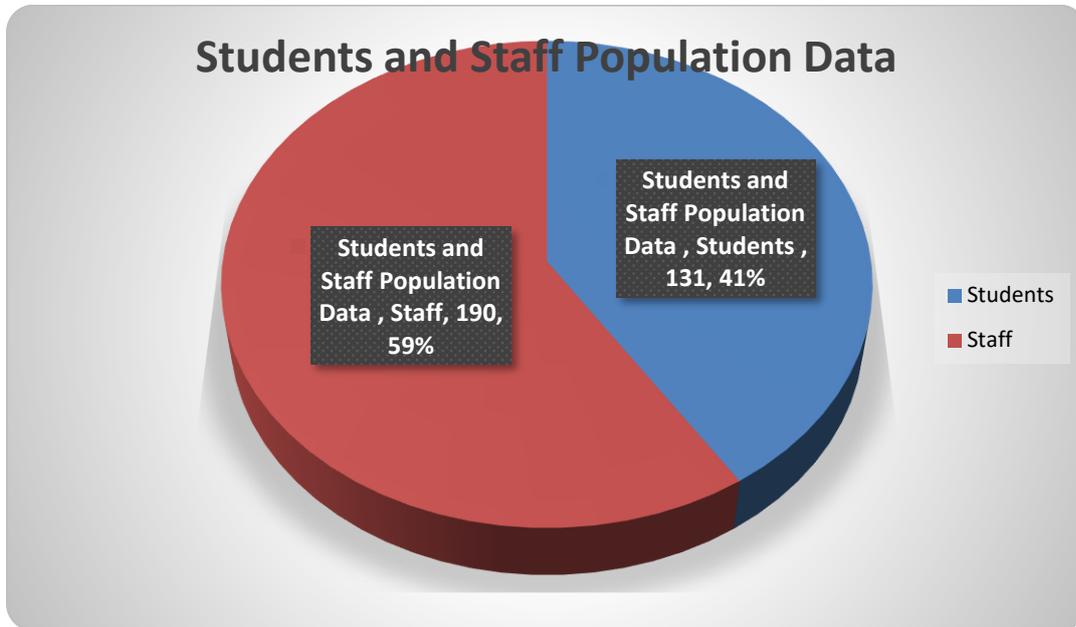
All EIAs will be published in line with the School drive towards being more transparent. Therefore, it is worth considering these points: Publishing EIAs:

- Remember that you are completing a public document; be aware of the language you use and do not include anything that may be deemed offensive or discriminatory.
- Ensure there is sufficient information to show that you have considered the three aims (mentioned above) of the general duty.
- That there is sufficient information on the effect proposal will have on the protected characteristics.
- Demonstrate evidence that you have analysed the information.
- Most importantly: Write in plain English, these are public documents and need to be clear and easily understood by all members of the public.

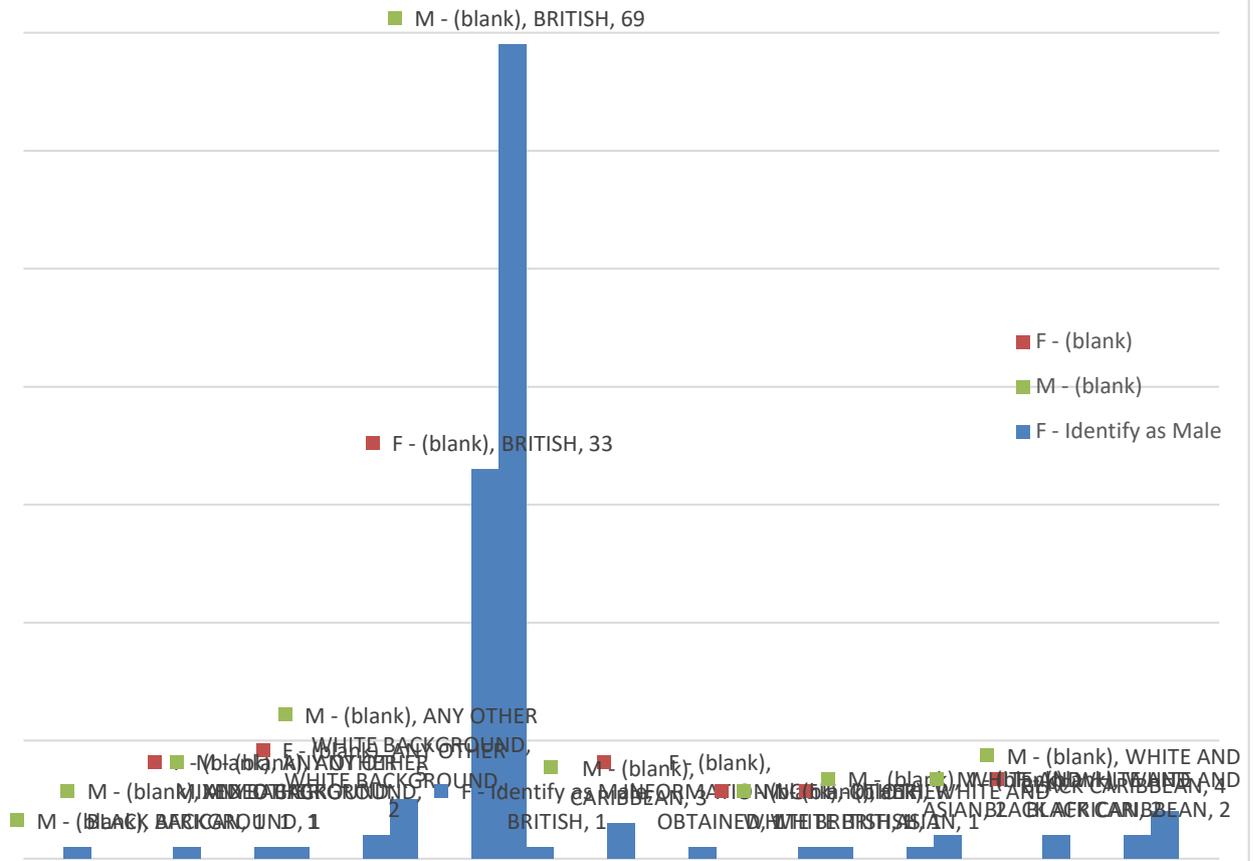
ANNEX C

Data Comparison for West Heath School Students and Staff Profile as at June 2019.

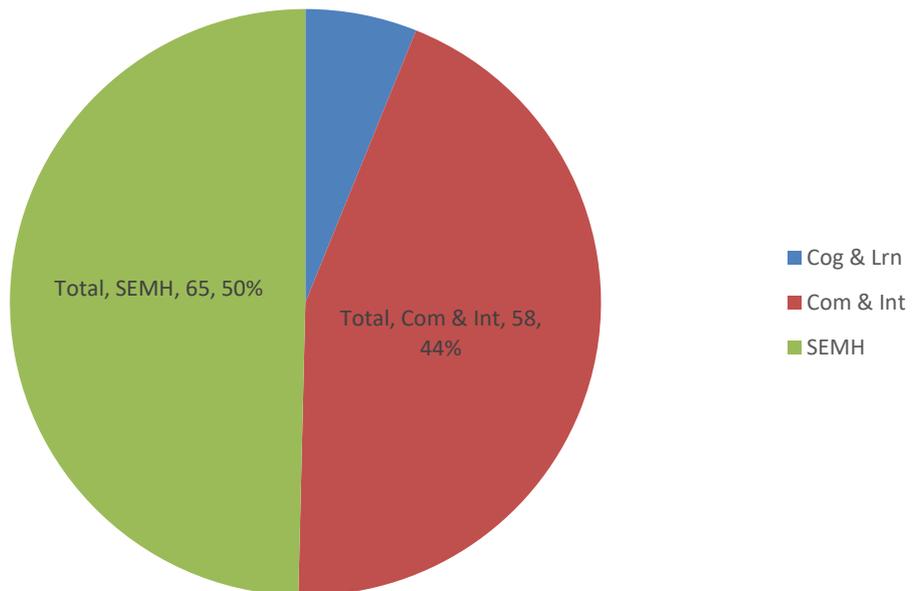
Combination of Students and Staff Profile

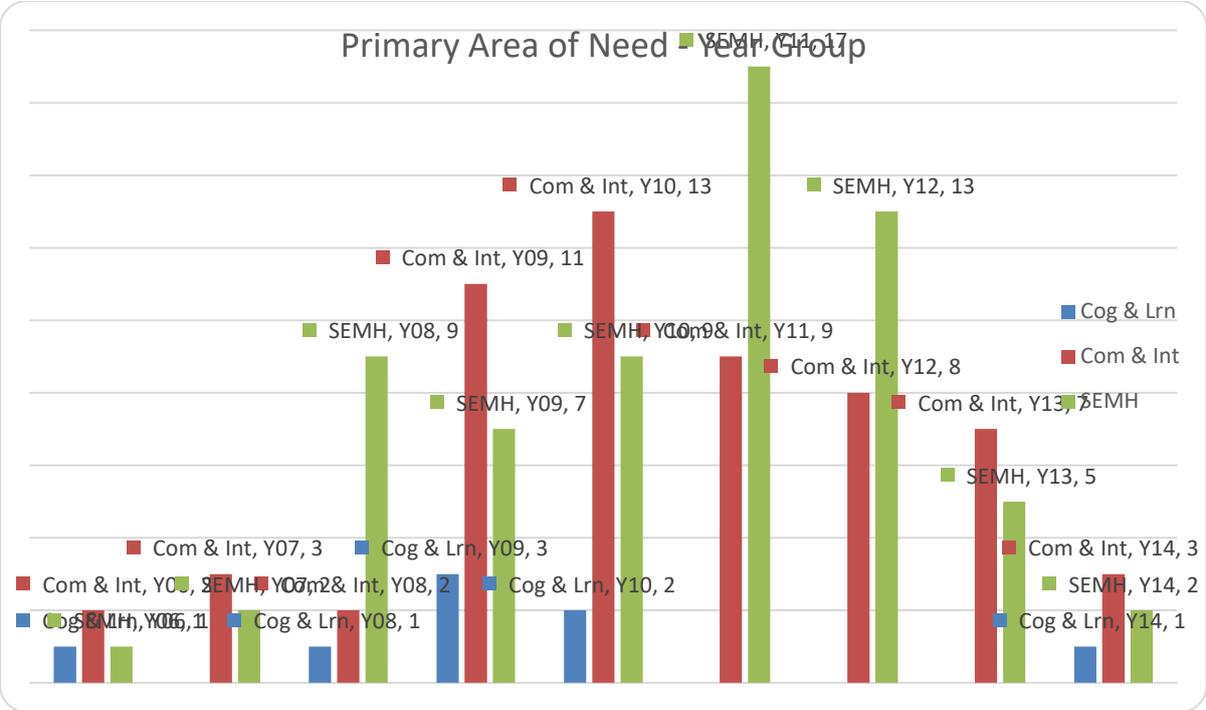
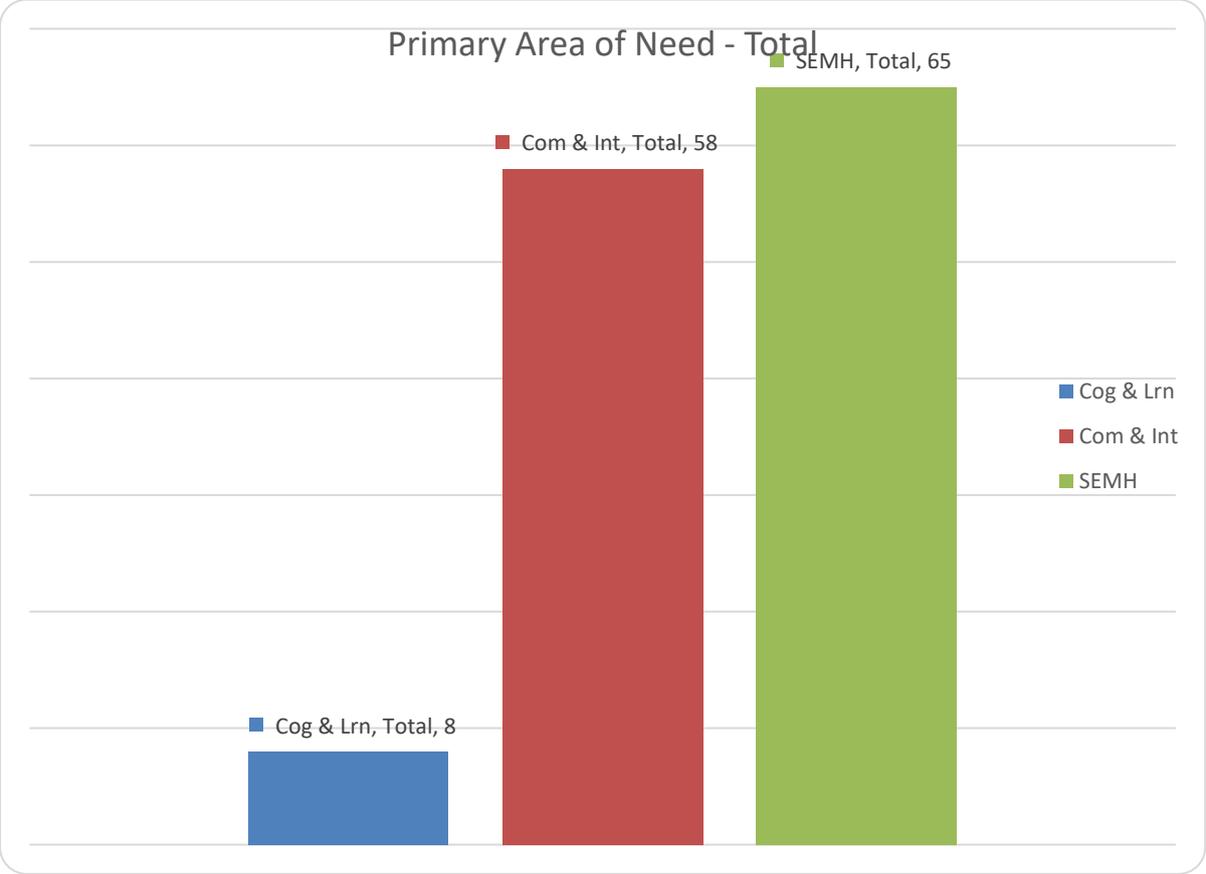


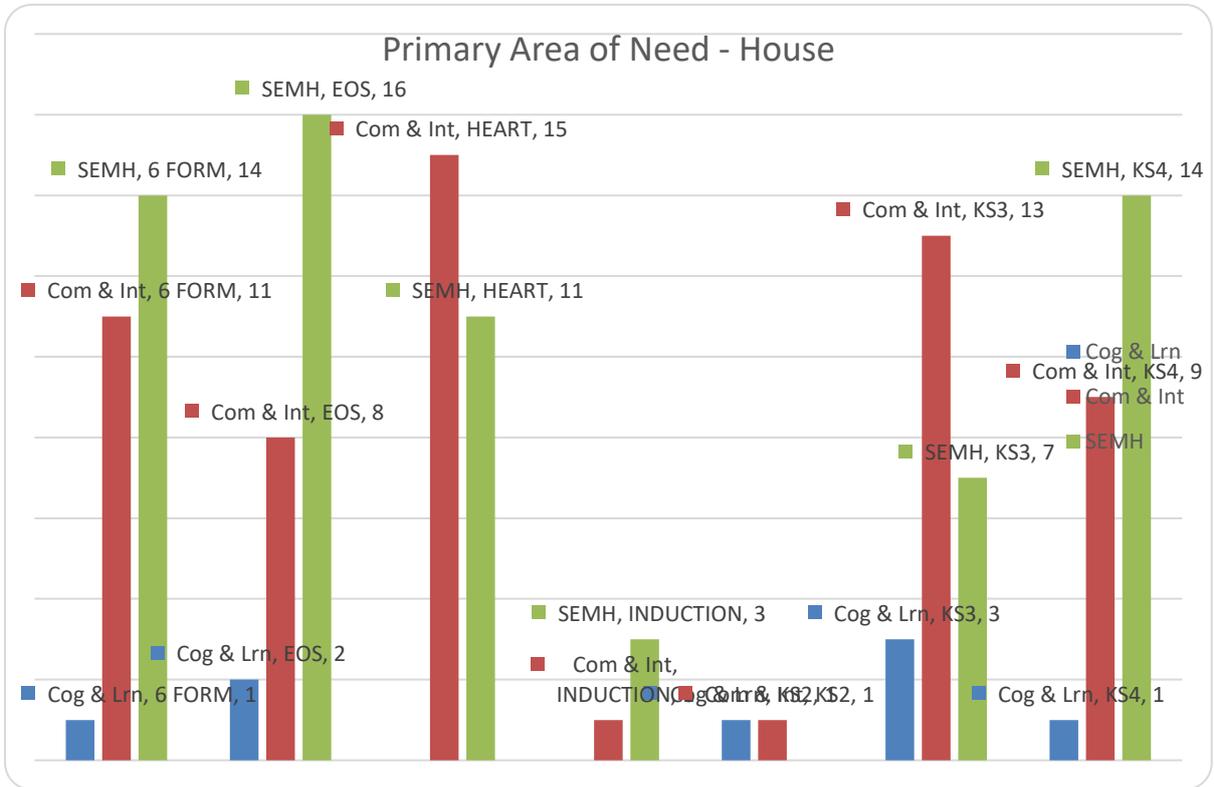
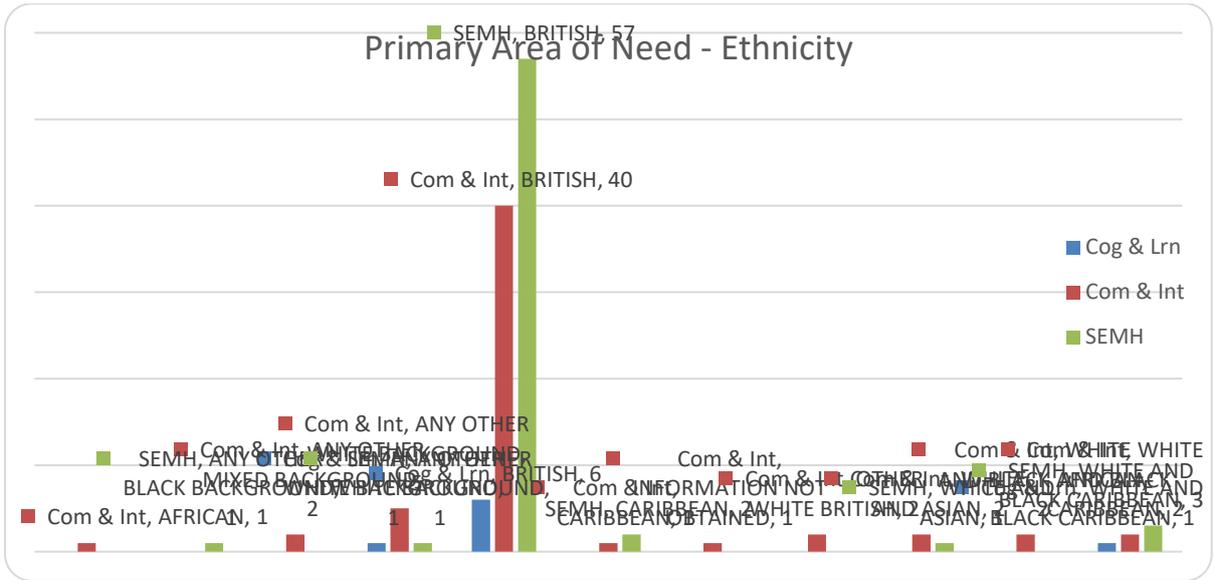
School Profile - Ethnicity and Gender



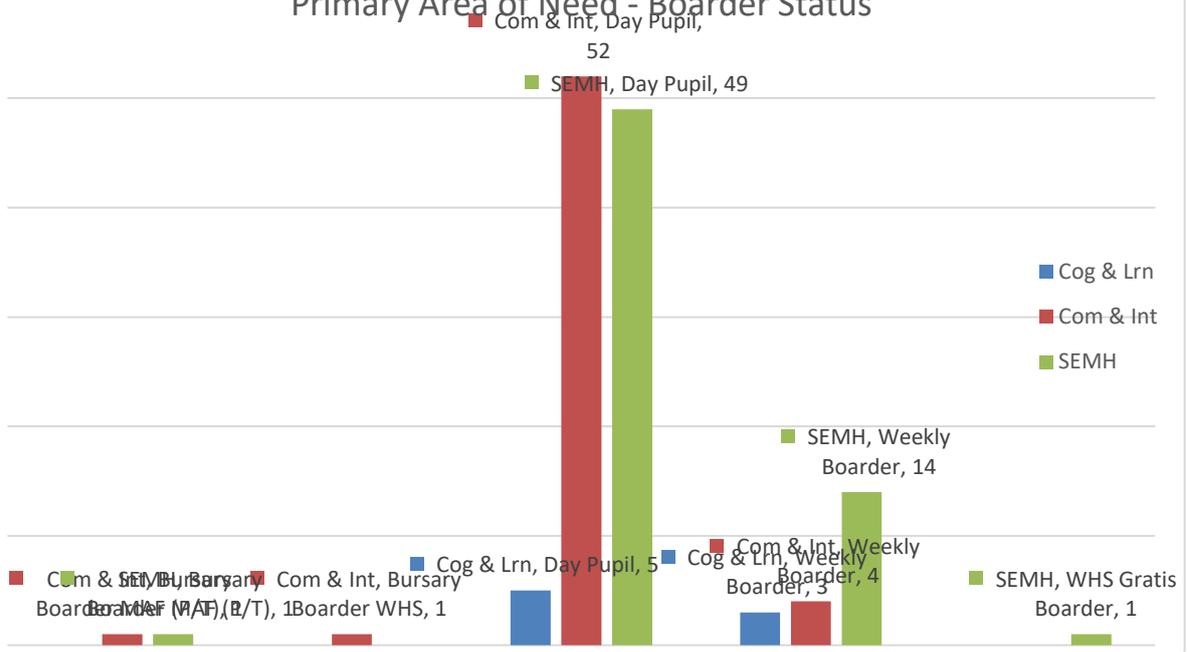
School Profile - Primary Area of Need



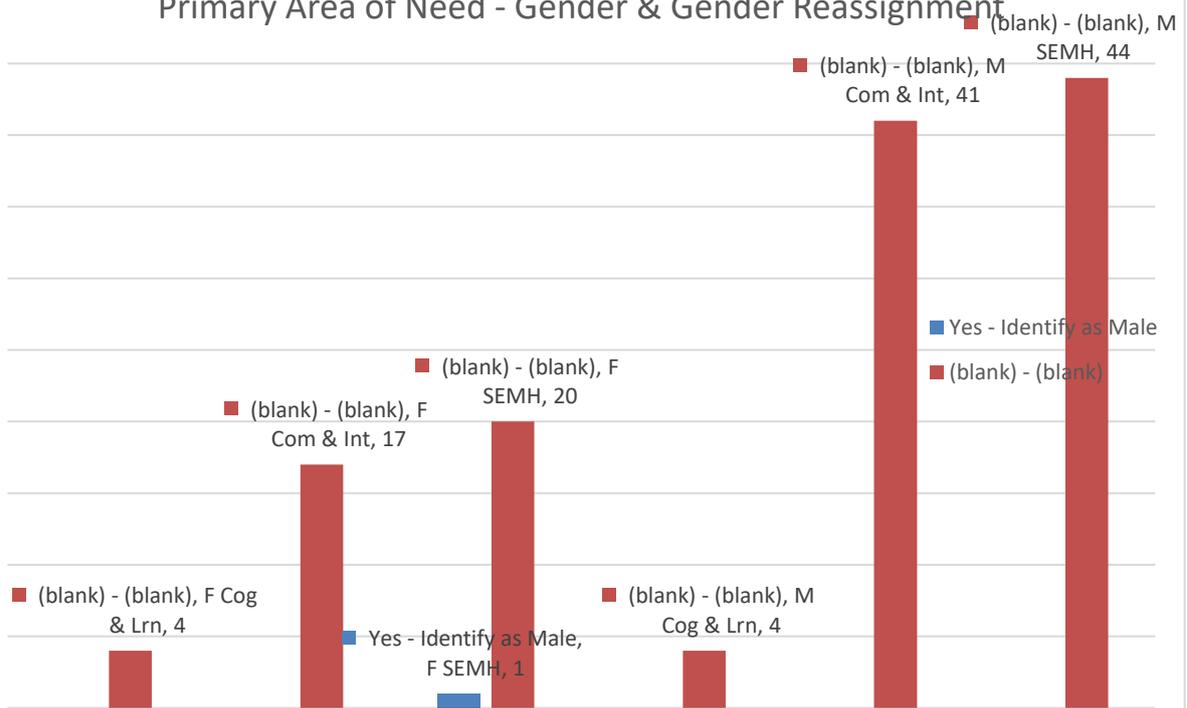




Primary Area of Need - Boarder Status



Primary Area of Need - Gender & Gender Reassignment



Male Staff Ethnicity Data Profiling

