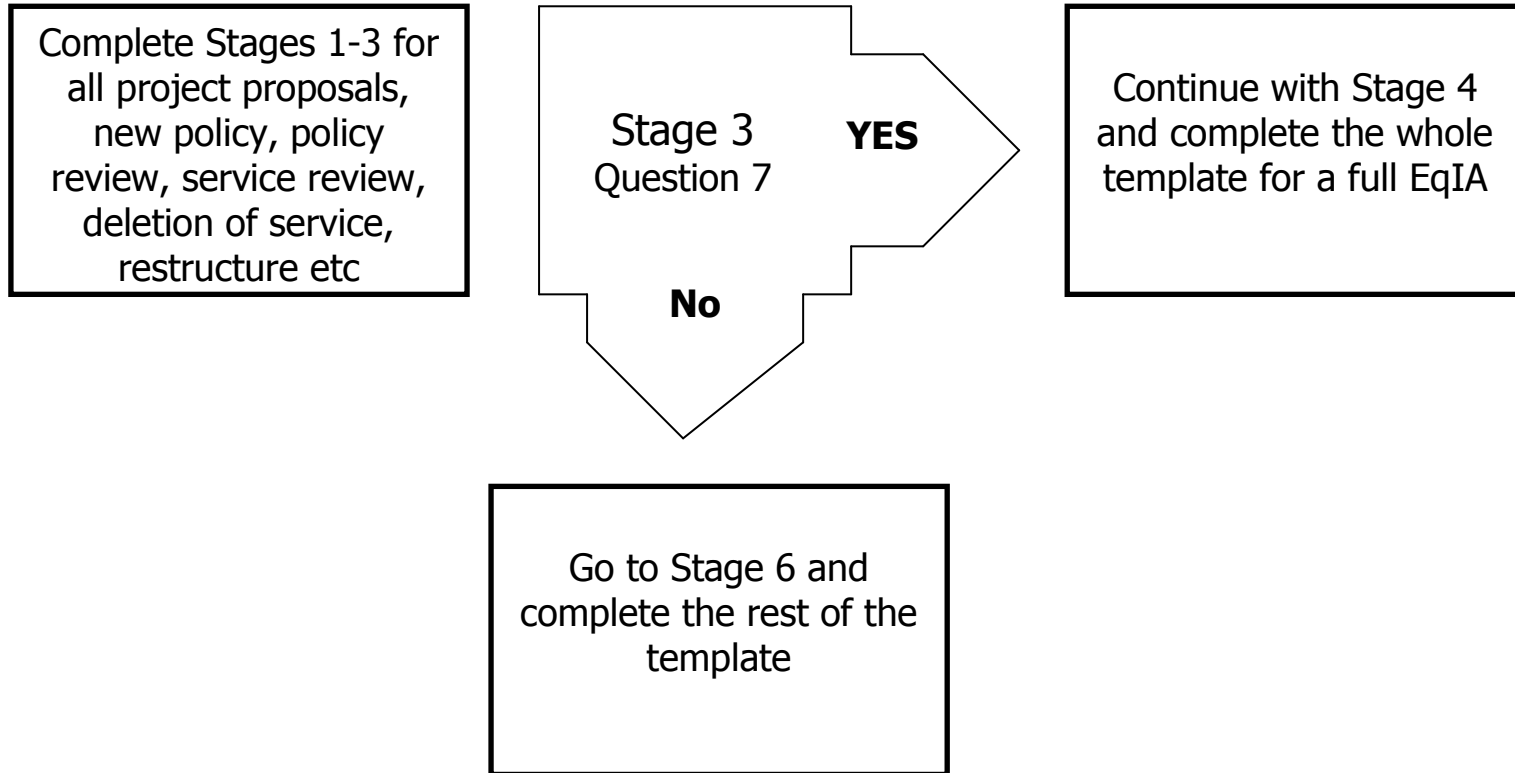


# Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



## Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick	Type of Decision:	Tick
Transformation			Cabinet	
Capital			Portfolio Holder	
Service Plan			Corporate Strategic Board	
Other			Other	
Title of Project:		<p>June Cabinet is being asked to agree to the relocation of the Harrow Pupil Referral Unit (PRU) to enable the redevelopment of the Harrow Teachers' Centre site.</p> <p>Current location:                      Harrow Teachers' Centre                      Tudor Road                      Wealdstone                      HA3 5PQ                      Tel: 020 8736 6336</p>		
Directorate / Service responsible:		Children and Families and Environment and Enterprise		
Name and job title of lead officer:		Johanna Morgan, Education Professional Lead, School Organisation		
Name & contact details of the other persons involved in the assessment:		Johanna Morgan, Education Professional Lead, School Organisation		
Date of assessment:		28 <sup>th</sup> May 2014		

### Stage 1: Overview

**1. What are you trying to do?**

(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

The PRU provides education for the most vulnerable children and young people in Harrow who have been excluded permanently from school or are at risk of permanent exclusion. It is managed by a Management Committee (similar to a Governing Body) and Headteacher. The Harrow PRU is located at the Teachers Centre and needs to be relocated for the beginning of the academic year in September 2014.

To enable the redevelopment of the Teachers Centre site to expand Whitefriars School, the Harrow Pupil Referral Unit (PRU) needs to be re-located by September 2014 for the start of the 2014/15 Academic Year. The preferred option for the relocation of the PRU is the former Bentley Centre site.

There is government guidance on accommodation for PRUs 'Learning Environments for PRUs DfES 2007 – key considerations for education provision'. The premises requirements should provide suitable learning environment for pupils with sufficient number, type and size of spaces to support the delivery of an effective curriculum. The accommodation should be suitable for a variety of group sizes and for ease of supervision. It needs to provide specialist curriculum facilities e.g. for science and design technology. PRUs provide for pupils with a range of needs and within the setting there should be accommodation that is appropriate for managing difficult behaviour and for managing vulnerable pupils.

The Harrow PRU requires self-contained accommodation ideally for up to 50 secondary students and 10 primary pupils with age appropriate environments. A separate location for the primary and secondary PRU pupils is an option. A couple of primary schools have expressed an interest to host the primary PRU and suggested different models of provision. There is a range of models from the co-location of the primary PRU on a school site to a commissioned service provided by the school. At this stage, it is proposed to retain the PRU as a single entity. Other considerations to the location include access and transport links, proximity to other schools and local residential issues.

<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? ( all that apply)</b>	Residents / Service Users		Partners		Stakeholders
	Staff		Age		Disability
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity
	Race		Religion or Belief		Sex
	Sexual Orientation		Other		
<b>3. Is the responsibility shared with another directorate, authority or organisation? If so:</b> <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	<p>Harrow has a statutory responsibility to provide sufficient school places and provision for permanently excluded pupils and those out of school. Children and Families directorate has overall responsibility but will be also working closely with Environment and Enterprise directorate in particular Head of Corporate Estate, Finance and Harrow Schools</p>				
<b>Stage 2: Evidence / Data Collation</b>					
<ul style="list-style-type: none"> <li><b>4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.</b></li> <li>(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</li> </ul>					
Age (including carers of young/older people)	<ul style="list-style-type: none"> <li>Harrow has a growing population of school aged children which may require increased PRU provision in future.</li> <li>There is a tendency towards older pupils accessing the Tuition Service with the majority 39% aged 15, this is followed by 23% aged 14 and 11% aged 13.</li> <li>The youngest is aged 5 (1%) and the eldest aged 16 (1%).</li> </ul>				

Disability (including carers of disabled people)	<ul style="list-style-type: none"> <li>We will ensure the new premises has disability access for children and staff.</li> <li>15% have a statement compared with 2% in high schools,</li> <li>32% are on school action plus compared with 13% high schools</li> <li>The relocation will not have a disproportionate impact on travel arrangements/time for children with disability or learning difficulties because there are good transport links from across Harrow to the proposed site. Children who are unable to travel independently will be transported by an adult to the setting.</li> </ul>
Gender Reassignment	<ul style="list-style-type: none"> <li>Not applicable in the context of the relocation of the pupil referral unit</li> </ul>
Marriage / Civil Partnership	<ul style="list-style-type: none"> <li>Not applicable in the context of the relocation of the pupil referral unit</li> </ul>
Pregnancy and Maternity	<ul style="list-style-type: none"> <li>Not applicable in the context of the relocation of the pupil referral unit</li> </ul>
Race	<ul style="list-style-type: none"> <li>There appears to be overrepresentation of White British, Black and some mixed ethnicity and under representation of Asian Indian and Asian other</li> </ul> <p><b>NB.</b> The numbers are small in individual categories which may impact on the comparisons. The move to a new site will not impact on identification of the cohort.</p>
Religion and Belief	<ul style="list-style-type: none"> <li>(Religion data to be supplied by Business Intelligence)</li> </ul>
Sex / Gender	<ul style="list-style-type: none"> <li>70% of pupils are male</li> <li>30% of pupils are female</li> </ul>
Sexual Orientation	<ul style="list-style-type: none"> <li>Not applicable in the context of the relocation of the pupil referral unit</li> </ul>
Socio Economic	<ul style="list-style-type: none"> <li>Free School Meals eligibility is around 40% compared to 20% in High Schools</li> </ul>
<ul style="list-style-type: none"> <li><b>5.</b> What consultation have you undertaken on your proposals?</li> </ul>	
No consultation has been undertaken	
The cohort of pupils who attend the PRU are those excluded from mainstream schools.	

A change in the site of the provision will not impact adversely on any group/ protected characteristic.

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
No consultation has been undertaken.			

• **6.** What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?  
  
List the Title of reports / documents and websites here.

- Cabinet Report dated 26<sup>th</sup> June 2014
- Schools White Paper and Education Act 2011
- Feasibility study carried out on two options outlined in the Cabinet Report
- Census Data 2013

**Stage 3: Assessing Potential Disproportionate Impact**

**7.** Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

**YES** - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- § **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- § It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

- § Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

### Stage 4: Collating Additional data / Evidence

<ul style="list-style-type: none"> <li>• 8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?</li> <li>• (include this evidence, including any data, statistics, titles of documents and website links here)</li> </ul>	Not applicable – Please go to ‘stage 6’
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• 9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).

## Stage 5: Assessing Impact and Analysis

**10.** What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)			Not applicable – Please go to 'stage 6'	
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				



Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				
<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?  If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	
<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?  If yes, what is the potential impact and how likely is to happen?	Yes		No	

**12.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on [Harrow HUB/Equalities and Diversity/Policies and Legislation](#)

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

§ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**

§ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

### Stage 6: Decision

**13.** Please indicate which of the following statements best describes the outcome of your EqIA ( tick one box only)

<b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

**13a.** If your EqIA is assessed as **outcome 3** or you have **ticked 'yes' in Q12**, explain your justification with full reasoning to continue with your proposals.

### Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan

### Stage 8 - Monitoring

- The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The Management Committee of the PRU will monitor the impact of the proposals once they have been implemented in conjunction with the Headteacher.
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The Local Authority monitors pupils' progress more generally and would intervene if there were areas of concern regarding performance.
<b>17.</b> Have you received any complaints or compliments about the	Considerations about the possible options for relocation of the PRU are

proposals being assessed? If so, provide details.	covered in full in the Cabinet report.
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**Stage 9: Public Sector Equality Duty**

**18.** How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	Strategic Commissioning for the Children & Families ETG.		
Signed: (Lead officer completing EqIA)	<i>Johanna Morgan</i>	Signed: (Chair of DETG)	<i>Richard Selwyn</i>
Date:	9 June 2014	Date:	9 June 2014
Date EqIA presented at the EqIA Quality Assurance Group	tba	Signature of ETG Chair	