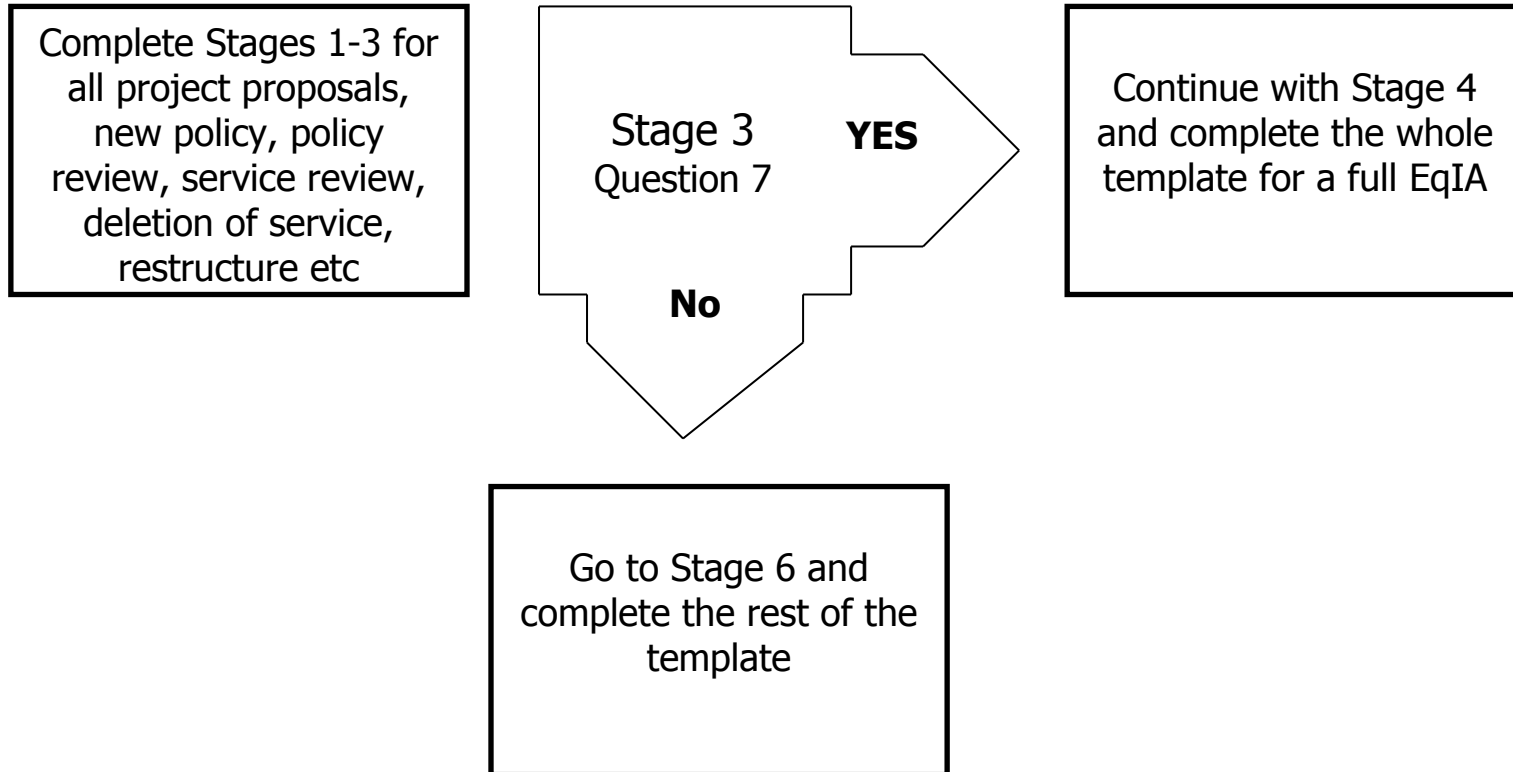


Equality Impact Assessment Template

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		<input type="checkbox"/>	Cabinet		<input checked="" type="checkbox"/>
Capital		<input type="checkbox"/>	Portfolio Holder		<input type="checkbox"/>
Service Plan		<input type="checkbox"/>	Corporate Strategic Board		<input type="checkbox"/>
Other	Implementing school expansion programme.	<input type="checkbox"/>	Other		<input type="checkbox"/>
Title of Project:		<p>Permanent expansion of the following community school(s): Welldon Park Infant and Nursery School Kingsley Road Harrow, HA2 8LT and Welldon Park Junior School Wyvenhoe Road Harrow, HA2 8LS</p> <p>At its meeting on 19 February 2015, Harrow Cabinet is recommended to approve the statutory proposals to expand permanently the Welldon Park infant and junior schools, or the combined primary school if the schools are amalgamated, by one form of entry (30 pupils) on 1 September 2015, which will fill incrementally from the point of admission into the school.</p>			
Directorate / Service responsible:		Children & Families			
Name and job title of lead officer:		Johanna Morgan, Education Lead School Organisation			
Name & contact details of the other persons involved in the assessment:		Chris Melly, Senior Professional, School Organisation Ranjit Matharu, Acting Headteacher of Welldon Park Infant and Nursery School James Simmons, Acting Headteacher of Welldon Park Junior School			

Date of assessment:	29 December 2014
Stage 1: Overview	
<p>1. What are you trying to do?</p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>Two sets of statutory proposals have been published in relation to Welldon Park Infant and Nursery School and Welldon Park Junior School. It is proposed to:</p> <ul style="list-style-type: none"> • Combine the schools to create a combined primary school from 1 September 2015; • Expand the school(s) from 1 September 2015. <p>The two sets of statutory proposals are separate and not linked. This EqIA relates to the proposal to expand the school(s).</p> <p>It is proposed to permanently expand Welldon Park Infant and Nursery School and Welldon Park Junior School, or the combined primary school if the schools are amalgamated, from 1 September 2015 to become three forms of entry school(s) (90 places) from the current two forms of entry (60 places).</p> <p>Education school expansion statutory processes are being undertaken. On 11 December 2014, Harrow Cabinet considered the outcome of the consultation about the proposed expansion and decided to publish statutory proposals to effect the expansion. The statutory proposals were published from 5 January to 2 February 2015. One representation by a resident objecting to the statutory expansion proposals was received by Harrow Council by the closing date of the representation period on 2 February 2015. The representation by the resident made a number of points about the planning processes in relation to the expansion decision. The joint response by the Governing bodies objects to the amalgamation proposal but made no reference to the expansion of the two schools. In their joint response to the consultation, the Governing Bodies recommended that in principle the schools should be expanded. The representation and officer comment will be reported to Harrow Cabinet when determining the statutory proposals on 19 February 2015.</p> <p>The permanent expansion of Welldon Park Infant and Nursery School and Welldon Park Junior School, or the combined primary school if the schools are amalgamated, is proposed as part of the Primary School Expansion Programme within Harrow Council's School Place Planning Strategy. Cabinet agreed its School Place Planning Strategy in February 2010 to meet the increasing demand for school places that is primarily birth rate driven. In July 2011, Cabinet agreed on</p>

	a Primary School Expansion Programme as part of the School Place Planning Strategy. The strategy aims to secure sufficient primary school places through the creation of additional permanent places, supplemented by planned bulge classes and contingency bulge classes, opened if required.					
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	✓	Partners / Schools	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other			
3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	<p>There is a statutory responsibility on the local authority to ensure sufficient school places in its area. Children & Families is the lead directorate, though the school expansion programme has to be delivered corporately with the involvement of officers from other directorates e.g. Environment and Enterprise, Finance, Performance, Legal.</p> <p>The school expansion programme is delivered in partnership between the local authority and schools.</p>					
Stage 2: Evidence / Data Collation						
<p>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.</p> <p>(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)</p>						
Age (including carers of young/older people)	The Greater London Authority (GLA) prepares the pupil projections for Harrow Council. The GLA uses a range of information and data to prepare the projections including the number of births, number of pupils in Harrow schools, migration to Harrow and new housing development. Across London the population is growing, and the main reason for this is increasing birth rate. The demand for Reception class places (for pupils reaching 5 years of age) in Harrow schools is increasing:					

	<ul style="list-style-type: none"> • In January 2006 there were 2,224 Reception aged pupils in Harrow schools; • In January 2013 there were 2,879 Reception aged pupils in Harrow schools; • In January 2014 there were 3,030 Reception aged pupils in Harrow schools; • In January 2016 it is projected there will be 3,463 Reception aged pupils in Harrow schools. <p>In September 2012 there were a total of 2,550 permanent Reception class places in Harrow’s primary sector schools. To ensure sufficient school places to meet the increased demand, temporary additional Reception classes have been opened since 2009. In order to meet the actual and predicted increased demand in the next few years there is a need to increase the number of permanent school places, in the primary sector initially and in the secondary sector in due course. Additional places are also required to meet increased demand for provision to meet special educational need. Phase 1 of the primary school expansion programme was implemented in September 2013 with 8 schools in the borough permanently increasing their Reception intakes. In September 2015, when all the Phase 2 schools are expanded, there will be 3,240 permanent Reception places. In order to ensure sufficient school places to meet the predicted increased demand by September 2016, Harrow needs to increase the number of permanent Reception places by at least a further 300 places to a total of 3,540. The Phase 3 proposals, that include Welldon Park Infant and Nursery School and Welldon Park Junior School, or the combined primary school if the schools are amalgamated, aim to ensure sufficient school places at the right time and in the right location to meet the increased demand up to 2016/17. Full information about the projected demand for school places and the planning to increase school places across Harrow can be viewed in the 17 July 2014 Cabinet papers (item 21 School Expansion Programme Appendix B) at http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&MId=62354&Ver=4</p> <p>See Appendix A of this EqIA for data about the profile of pupils attending the schools.</p>
<p>Disability (including carers of disabled people)</p>	<p>The schools are mainstream schools, which make appropriate provision for pupils with SEN who attend mainstream schools. Welldon Park Infant and Nursery School has specialist resourced provision for children with specific language impairment and no change in this is proposed under these proposals. Currently, any accessibility issues would be dealt with by the schools under a management principle of meeting needs at a ground floor level should there be access issues. This issue would be considered to see whether any access issues could be addressed as part of the building works if the expansion proceeds.</p> <p>An increase in children of school age can be expected to include increased numbers of children with disability and special educational needs. The total number of statements of special educational need in Harrow has increased by 93 (or 9%) between 2006 and 2011 calendar years. In addition, the percentage of children with a statement placed in a special school (Harrow, other local authority, independent or non-maintained) has increased from 35% to 43% during the same period. This represents continued pressure</p>

	<p>and demand for more special school places. On 18 July 2013, Harrow Cabinet approved the Special School SEN Placements Planning Framework for bringing forward proposals over the next 3-5 years to increase provision for children and young people with special educational needs. Following successful applications in accordance with this framework to the Government's Targeted Basic Need Programme, 151 additional new SEN school places will be provided from 2015.</p> <p>See Appendix A of this EqIA for data about the profile of pupils attending the schools.</p> <p>See Appendix B of this EqIA for the profile of respondents to the statutory consultation.</p> <p>Consultations about expansion proposals at schools in the School Expansion Programme have identified concerns from residents about emergency services being unable to respond to urgent resident needs during school drop off and collection times. This is recognised as a potential issue and traffic mitigation measures, and the school travel plan work to reduce car use, will reduce the risk of this eventuality arising.</p>		
Gender Reassignment	Not applicable in the context of the expansion of these schools.		
Marriage / Civil Partnership	Not applicable in the context of the expansion of these schools.		
Pregnancy and Maternity	Not applicable in the context of the expansion of these schools.		
Race	<p>These are community schools which draw pupils from its local area and the pupil profiles reflect the ethnicity of their area. The October 2014 School Census data demonstrates that the school has an ethnically diverse pupil population. See Appendix A of this EqIA for data about the profile of pupils attending these schools.</p> <p>See Appendix B of this EqIA for the profile of respondents to the statutory consultation.</p> <p>See Appendix C of this EqIA for the ethnic groups in the main wards from which children attend these schools.</p>		
Religion and Belief	<p>These are community schools which draw pupils from their local area and the pupil profiles reflect the religions and beliefs of their area.</p> <p>See Appendix B of this EqIA for the profile of respondents to the statutory consultation.</p>		
Sex / Gender	These are community schools which draw pupils from their local area and the pupil profiles reflect the gender of their area. See Appendix A of this EqIA for data about the profile of pupils attending these schools.		
Sexual Orientation	Not applicable in the context of the expansion of these schools.		
Socio Economic	Not applicable in the context of the expansion of these schools.		
5. What consultation have you undertaken on your proposals?			
Who was consulted?	What consultation methods were	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the

	used?		findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).				
<p>Statutory consultation was held with the schools, their communities of parents, staff and governors, local residents and interested parties about the expansion proposal between 29 September and 14 November 2014.</p>	<p>Consultation information was widely distributed including to neighbouring Local Authorities, local MPs, Councillors, Union representatives, Diocesan Bodies, voluntary organisations, and Harrow Youth Parliament. Information was put on the Harrow Council website, together with a facility for online response to the consultation for residents. The Council distributed a letter to local residents to inform them of the consultation and to invite them to the consultation meetings at the schools. The schools distributed information and response forms to</p>	<p>Consultation about the proposal to expand and combine Welldon Park Infant and Nursery School and Welldon Park Junior School was held between Monday 29 September 2014 and Friday 14 November 2014.</p> <p>Officers attended open consultation meetings during the consultation period at the schools about the expansion proposal to give a presentation and answer questions.</p> <p>Consultation responses 109 responses were received to the consultation. Separate consultation questions were given to the school communities from those given to local residents because the amalgamation proposal was not relevant to the local residents without children attending the schools.</p> <ul style="list-style-type: none"> • 94 responses were received to the consultation questions for the school communities. • 15 responses were received to the consultation questions for residents. <p>A number of comments were included with the responses and the main themes are summarised below together with officer response to the themes.</p> <p>Responses from the school communities to the consultation questions about amalgamation and expansion Questions were asked in the consultation about the two proposals. They were:</p> <ul style="list-style-type: none"> • “Proposal 1: that Welldon Park Infant School and Welldon Park Junior School should join together to form one combined school on 1st September 2015.” • “Proposal 2: that the combined school or the two schools (depending on the outcome of Proposal 1) should expand to three forms of entry (90 places per year) from 1st September 2015.” <p>Both questions offered the option to respond ‘Yes’, ‘No’, or ‘Not Sure’ to each question. Opportunity was given for comments to be added after each question if the respondent wished to do so. The following table provides overall responses to the consultation question about expansion.</p> <table border="1" data-bbox="638 1390 1709 1423"> <tr> <td></td> <td>Junior</td> <td>Infant</td> <td>Total (91)</td> </tr> </table>		Junior	Infant	Total (91)	<p>On 11 December 2014, Harrow Cabinet considered the outcome of the consultation about the proposed expansion and decided to publish statutory proposals to effect the expansion.</p> <p>Additional resource has been committed to ensure an appropriate profile to all the school expansion projects in particular.</p> <ul style="list-style-type: none"> • Transport Assessments are being undertaken at each of the schools proposed for expansion. The assessments provide an independent view of the proposals by reviewing baseline information about current traffic volumes and current issues and make recommendations about any impact as well as setting out any actions required. The
	Junior	Infant	Total (91)				

their parents, staff and governors and arranged open consultation meetings for parents and residents to enable discussion about the proposal.

I support expansion to three forms of entry as either combined or separate schools	25	28	53 (58%)
I do not support expansion to three forms of entry as either combined or separate schools	10	14	24 (26%)
I am not sure	6	8	14 (15%)

The responses made by respondents from the school communities to the consultation question about expansion indicate agreement with the Council’s proposal to expand the Welldon Park schools.

Responses from local residents to the consultation questions about expansion

Two questions were asked in the consultation. They were:

- “Do you agree with the approach to creating additional school places in Harrow?”
- “Do you agree with the proposal to permanently expand the Welldon Park Schools?”

Both questions offered the option to respond ‘Yes’, ‘No’, or ‘Not Sure’ to each question. Opportunity was given for comments to be added after each question if the respondent wished to do so. The following tables provide overall responses to the consultation questions.

The overall responses to Question 1 were:

Question 1: “Do you agree with the approach to creating additional school places in Harrow?”

Response	Number	Percentage
Yes	8	53.33%
No	6	40.00%
Not Sure	1	6.67%
Total	15	100.00%

The overall responses to Question 2 were:

Question 2: “Do you agree with the proposal to permanently expand the Welldon Park Schools?”

Response	Number	Percentage
Yes	4	23.67%
No	10	66.67%
Not Sure	1	6.66%
Total	15	100.00%

assessments take account of the consultation responses already received.

- A Transport and Travel Planner Officer for the expansion projects works with schools to develop and implement effective travel strategies in conjunction with the schools. This is a key role in influencing and engaging with all stakeholders to change attitudes to travel through the review and the development of School Travel Plans in order to minimise the use of private car travel to the school, particularly by parents. This role also liaises with the Highways, Traffic Management and Enforcement teams to ensure that any necessary engineering work and enforcement action, including Safer Neighbourhood Teams, is provided in line with the travel plans developed. This officer is also involved in the pre-planning engagement activities and input into the planning applications.

	<p>Just over half the responses made to the first consultation question indicate agreement with the Council's approach to creating additional school places in Harrow.</p> <p>Two thirds of the respondents to the second consultation question disagree with the Council's proposal to expand the Welldon Park schools, and just over a quarter agree with the proposal.</p> <p>The low response level of 15 needs to be viewed in the context of 500 consultation papers distributed to local residents. Also the publicising of the online consultation response portal on the Harrow Council website.</p> <p>Other responses to the consultation <u>Governing Body</u> The Governing Body of Welldon Park Infant and Nursery School and the Governing Body of Welldon Park Junior School made a joint formal statement to the statutory consultation. In the joint statement the Governing Bodies recommend that the schools should not be combined and recommend that in principle the schools should be expanded.</p> <p><u>Staff of Welldon Park Infant & Nursery School</u> A letter was received from the staff of Welldon Park Infant & Nursery School stating disagreement with the proposal for amalgamation as a split site primary school and disagreeing that consultation should be taking place regarding expansion at the same time. The staff strongly believes alternative school models should be considered. Their preferred model for the infant school is an all through primary school with specialist provision for SEN on the present school site. The justification for their views is set out in the letter.</p> <p>Officer response to the consultation comments The six main themes in consultation comments and responses relate to:</p> <ul style="list-style-type: none"> • Lack of information about buildings and implications for residents; • Other alternatives should be considered; • The schools do well as they are - preference that they remain separate schools; • The schools are already full to capacity; • Traffic and congestion issues; • Concerns about split site. <p>Lack of information about buildings and implications for residents Information about the proposed expansion of the Welldon Park schools was sent to 500 residents in properties adjoining the school sites and along approach streets and included invitation to attend the consultation meeting for residents on 23 October 2014. This action was taken deliberately to give early information to residents about the proposal and so residents' perspectives can be taken into account from the outset. Inevitably, detailed</p>	<ul style="list-style-type: none"> • The Transport Assessment and School Travel Plans are submitted as part of the planning applications. • There is a communication strategy for the expansion projects which includes raising the profile of school travel planning. Additional Communications officer time will be commissioned to give communication and engagement work a high profile. • Parking enforcement officers visit the areas of all schools in Harrow and issue tickets when applicable. Two automatic number plate recognition CCTV cars have been introduced to reinforce enforcement work. They are dedicated to schools exclusively.
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information could not be given about the building arrangements if expansion is approved because site scoping work needs to be undertaken. However, the comments and issues stated by residents have been noted for consideration by Cabinet and these would inform the building design proposals should the expansion be approved.

The initial site scoping will be completed by the end of term, undertaken by the Council with the schools. Options will be developed to address the additional requirements. This process will be undertaken in partnership with the school.

Other alternatives should be considered

Comments were made that it has been confusing to have consultation about the amalgamation and expansion proposals at the same time. Also, that there are alternative proposals that could be considered.

It is important to have clear proposals so that the consultation is not confusing. Harrow Council has an Amalgamation Policy and the consultation proposal is to amalgamate the two schools in accordance with the policy. The Council believes this is the best model for a primary school. The Steering Group included additional information about other models of school organisation for example, federation, and academy status.

Harrow Council also has a School Expansion Programme. Harrow Cabinet has approved that Phase 3 school expansion proposals be brought forward to meet the increased demand for places in 2015 and 2016. It is expedient to consult about both proposals at the same time rather than in close proximity to each other. Consultation at the same time on amalgamation and expansion proposals has occurred also at the Weald schools.

Some preference has been expressed for two separate primary schools to be created at the Welldon Park school sites to meet the increasing demand for school places. Although two additional forms of entry are projected to be needed in the South West Primary Planning Area within which the Welldon Park schools are located, there is not the demand for these additional forms of entry to be provided at the one location. Additional places are opened as local to the demand as possible to minimise any need for parents to use cars to take their children to and from school, and expansion by a form of entry at a different school location will be sought. Additional considerations are: two community primary schools beside each other would have the potential to introduce unhelpful competition; concerns have been raised in consultation responses about the congestion on the road infrastructure for the proposed expansion of one form of entry, which can be expected to be heightened if a doubling of pupils was proposed; the capital costs of creating two primary schools are likely to be comparatively high.

The proposal that one of the schools could be a one form entry is not considered to be the most efficient form of school organisation. Although small schools do perform well, they are very susceptible to changes to funding and have little capacity to develop economies of scale as single entities.

For transparency, other school organisation options were outlined in the consultation document distributed to parents and staff that the working group had investigated. Also, at the parent consultation meetings, addresses giving alternative perspectives were made by the Headteacher of Welldon Park Infant and Nursery School and by the Chair of Governors of Welldon Park Junior School. During the consultation it was pointed out that comments on other models could be made and responses in other formats e.g. email or letters would also be accepted. This has occurred, and all consultation responses will be made available to Cabinet in the decision making process.

The schools do well as they are - preference that they remain separate schools

Amalgamation is about combining two schools organisationally while preserving and building on what works well at each school. Achieving high educational standards and preserving ethos that is in the children's interests will be key focus of the governing body and leadership team of a combined school. A combined school enables the curriculum for the whole primary phase to be planned and delivered under one leadership. This provides continuity for the pupils throughout their primary education. It is of note that the governing bodies of the two schools have put forward options around extending the age range of each school to provide a primary school, therefore the concern does not appear to be about primary provision under one head teacher and governing body, but more about the individual schools amalgamating.

The schools are already full to capacity

Site scoping work has started and architects are undertaking an assessment of the current buildings and comparing them to the government's area guidance for a three form entry school and for the proposed amalgamation. This work would ensure that there is sufficient and appropriate space for additional children on the school sites. The two schools sites are very different in their current buildings and accommodation and therefore the solutions will be site specific.

Points were made at the infant school parent consultation meeting that only two additional classrooms would be needed at the infant school site. Architects could perhaps look into the possibility of a second storey. The school were able to work around the hall space when there were 60 more children at the school before the changes in the age of transfer in September 2010 that led to the move from first and middle schools in Harrow.

The architects gave further feed back to the schools about site scoping options before the end of the autumn term.

Traffic and congestion issues

The concerns expressed about traffic congestion, parking and road safety in the area are fully recognised and are the consistent major theme arising from the expansion consultations. To minimise the impact of the additional pupils attending the schools proposed for expansion, a cross-council approach is being implemented. This approach

brings officers together from Children and Families, Enterprise and Environment and Communications to co-ordinate work.

This proposal would require a building programme, for which planning permission would be needed. If an application is submitted, a decision on this will be a matter for the Planning Committee. This committee will consider highways and traffic concerns and the impact of the development on the local area. Residents and parents who believe they are impacted by this decision are entitled to make representations to the planning committee during the statutory planning consent timescales.

Concerns about split site

The governing bodies raised a concern about an amalgamated school on split sites and in particular the funding for this. Whilst it is true that all other amalgamations of primary schools in Harrow have been on one site, there is evidence of one head teacher and one governing body leading schools on different sites. Specifically, the hard federation of Heathland and Whitefriars worked successfully prior to conversion of the schools to academy status. Other schools in London and other areas have amalgamated on separate sites.

A combined school would receive a budget calculated in accordance with Harrow's funding formula, which is primarily based on an amount per pupil. In accordance with the Schools Funding Formula, as a combined school, there would be the loss of one 'lump sum' which currently totals £154,230 annually.

This would put the combined school in the same position as existing all-through primary schools over time. If the schools were to combine, in the first year, the two separate school budgets would be brought together.

In the year following the proposed amalgamation (2016/17) the combined school would receive the equivalent of 85% of two lump sums. This would allow time for the Governing Body to plan for this change which represents a comparatively small amount of the combined school budget (about 5%). Funding efficiencies arising from combining the schools can be used to offset this reduction. The Governing Body and leadership team of a combined school should be able to plan strategically in a cost effective manner in the best interests of the children in order to achieve positive outcomes for the children in the long term.

It should also be noted that there is currently no provision in the School Funding Formula for split site schools as this is not relevant to Harrow. However, the Schools Forum will consider this funding element from April 2017 when it would be required after the lump sum reduction has been implemented.

Over time, other amalgamated schools (on shared sites) have found that there have been efficiencies generated as a combined school including one Headteacher salary and shared

back office functions. In general larger schools have greater economies of scale and capacity to deal with financial pressures and to be more flexible and creative with their funding although some of these savings will be more difficult to achieve on a split site.

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.

The GLA School Roll Projections Service draws on a range of available national and regional data to inform its projections.
A regional approach is an important aspect of meeting the needs of children and young people with special educational needs. Discussions are held with free school proposers, and with neighbouring local authorities through the West London Alliance, to inform work to meet the need.

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

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?
(include this evidence, including any data, statistics, titles of

Note: Please go to Stage 6.

documents and website links here)			
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).
Note: Please go to Stage 6.			

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. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	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)			Note: 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						
11. Cumulative Impact – 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			Yes		No	

potential impact?		Note: Please go to Stage 6.							
11a. Any Other Impact – 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				
	Note: Please go to Stage 6.								
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.									
<ul style="list-style-type: none"> ▪ 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)									
Outcome 1 – 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.								✓	
Outcome 2 – 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>									
Outcome 3 – 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. (Explain this in 13a below)	
Outcome 4 – 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
Age. Insufficient school places for children in Harrow.	Work has been undertaken to maximise funding from the Government to create additional school places. This has included applications to the Priority School Building Programme and the Targeted Basic Need Programme, as well as work to maximise the annual basic need allocations.	Delivery, affordability and value for money will be monitored by the corporate Programme Board. Key milestones will be reported with RAG ratings to monitor progress.	1 September 2015.	Chris Spencer, Corporate Director Children & Families, through the Programme Board.	1 September 2013

Disability. Mobility access.	Access issues will be considered throughout the design and construction processes.	As far as possible, the approach is to build towards an accessible school. It may be possible to address any access issues as part of the building works if the expansion proceeds.	1 September 2015.	Russell Eacott, Head of Capital Project Team	18 February 2014 (access issues raised at weekly update meeting)
Insufficient education provision to meet the needs of children with special educational needs.	This area of potential adverse impact of the increased number of children in the borough has been considered. Harrow Cabinet agreed its Special School and SEN Placements Planning Framework in July 2013 and, following successful applications to the Government's Targeted Basic Need Programme, new places are being created at special schools and through new additionally resourced provision places in Harrow's mainstream schools from September 2015.	Completion of the projects to expand Harrow's special schools and to create units for more additionally resourced provision places in Harrow's mainstream schools.	1 September 2015.	Chris Spencer, Corporate Director Children & Families, through the Programme Board.	1 March 2013
Residents / Service Users. Many concerns about the impacts of traffic congestion.	Measures are being put in place to address the traffic and congestion issues arising from the creation of additional school places. See Stage 2 Section 5 above.	Traffic Assessment and School Travel Plan will be submitted as part of the Planning Application.	June 2015.	Russell Eacott, Head of Capital Project Team.	November 2013.

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.

15. How will you monitor the impact of the proposals once they have

The School Organisation Officer Group, comprised of representatives

<p>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></p>	<p>from relevant corporate departments, meets monthly and will monitor the impact of proposals and the continuing levels of need.</p>
<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Regular reports are presented to Cabinet on school organisation matters, including quarterly update reports on the school expansion programme. These reports are published on the Harrow Council website.</p> <p>The School Expansion Stakeholder Reference Group has been established and meets monthly. The School Expansion Stakeholder Reference Group is a cross party representative group to provide advice and guidance on the implementation of the school expansion programme. The meetings are minuted.</p> <p>The Programme Board of senior corporate officers and the constructor meets regularly to monitor the construction programme to ensure appropriate accommodation is provided at the schools for the additional pupils.</p>
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>A range of views and comments were received in support and opposed to the expansion proposal (see section 5 in Stage 2 above).</p> <p>School communities</p> <p>The responses made by respondents from the school communities to the consultation question about expansion indicate agreement with the Council’s proposal to expand the Welldon Park schools.</p> <p>Residents</p> <p>Just over half the responses made to the first consultation question indicate agreement with the Council’s approach to creating additional school places in Harrow.</p> <p>Two thirds of the respondents to the second consultation question disagree with the Council’s proposal to expand the Welldon Park schools, and just over a quarter agree with the proposal.</p> <p>However, the low response level of 15 needs to be viewed in the context of 500 consultation papers distributed to local residents. Also</p>

the publicising of the online consultation response portal on the Harrow Council website.

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
By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.

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.

19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The corporate Equality Impact Assessment Quality Assurance Group.		
Signed: (Lead officer completing EqIA)	<i>Chris Melly</i>	Signed: (Chair of DETG)	<i>Roger Rickman</i>
Date:	29 th December 2014	Date:	30 th December 2014
Date EqIA presented at the EqIA Quality Assurance Group	5 th January 2015	Signature of ETG Chair	<i>Mohammed Ilyas</i>

October 2014 School Census	Welldon Park Infant & Nursery School
AGE as at 31st August 2014	
3	19.8%
4	22.9%
5	23.3%
6	34.0%
Grand Total	262
GENDER	
Female	48%
Male	52%
Grand Total	262
ETHNICITY	
Bangladeshi	2.3%
Indian	9.2%
Asian Other	27.5%
Pakistani	5.0%
Chinese	0.4%
Black African	7.3%
Black Caribbean	3.1%
Black Other	1.5%
Mixed Other	4.6%
Mixed White/Asian	0.8%
Mixed White/Black African	1.1%
Mixed White/Black Caribbean	0.8%
Refused	0.4%
White British	5.3%
Any Other Ethnic Group	1.1%
White Irish Traveller	0.0%
White Irish	0.4%
White Other	8.4%
Unknown	21.0%
Grand Total	262
SEN	
No SEN	79.8%
School Action	6.9%
School Action Plus	8.4%
Statement of SEN	5.0%
Grand Total	262

Source: Collect export: all schools Blade-Export_06-11-2014_pupilonroll.xls

October 2014 School Census	Welldon Park Junior School
AGE as at 31st August 2014	
7	22.8%
8	22.8%
9	31.7%
10	22.8%
Grand Total	268
GENDER	
Female	40%
Male	60%
Grand Total	268
ETHNICITY	
Bangladeshi	2.6%
Indian	9.3%
Asian Other	34.7%
Pakistani	6.0%
Black African	10.8%
Black Caribbean	4.9%
Black Other	2.6%
Chinese	0.4%
Mixed Other	2.6%
Mixed White/Asian	3.0%
Mixed White/Black African	2.2%
Mixed White/Black Caribbean	0.7%
Refused	0.4%
White British	4.1%
Any Other Ethnic Group	1.9%
White Irish Traveller	0.0%
White Irish	1.9%
White Other	11.2%
Unknown	0.7%
Grand Total	268
SEN	
No SEN	82.5%
School Action	6.3%
School Action Plus	7.5%
Statement of SEN	3.7%
Grand Total	268

Source: Collect export: all schools Blade-Export_06-11-2014_pupilonroll.xls

Monitoring information

When completing their responses to the consultation, resident respondents were invited to provide information about how they perceive their social identity to assist with monitoring the effectiveness of the consultation outreach. Anonymous information was requested under the following categories: disability; ethnic group; and religion. The following tables show the responses received under these categories.

Respondents by Disability

	Number	Percentage
Not Disabled	15	100%
Disabled	0	0%
Not Stated	0	0%

Respondents by Ethnic Group

Ethnic Group	Number	% of total response
Asian Or Asian British	5	33.33%
Black or Black British	1	6.67%
Other Ethnic Group	0	0%
Mixed ethnic background	1	6.67%
White	8	53.33%
Did Not Specify	0	0%

Respondents by Religion

	Number	Percentage
Buddhism	0	0%
Christianity	6	40.00%
Hinduism	1	6.67%
Islam	1	6.67%
Jainism	0	0%
Judaism	0	0%
Sikh	0	0%
Zoroastrian	0	0%
Other	1	6.66%
No Religion	3	20.00%
Not Stated	3	20.00%

KS201EW - Ethnic group		South West Primary Planning Area								Appendix C	
ONS Crown Copyright Reserved [from Nomis on 19 February 2014]											
Population - All usual residents		Main Wards for the South West Primary Planning Area									
Units - Persons		(Over 40% of pupils in these Wards attend schools in the planning area)									
Date - 2011											
Ethnic Group	Harrow on the Hill		Rayners Lane		Roxbourne		Roxeth		West Harrow		
	number	%	number	%	number	%	number	%	number	%	
All usual residents	12,270	100.0	11,124	100.0	12,828	100.0	11,663	100.0	10,373	100.0	
White: English/Welsh/Scottish/Northern Irish/British	4,224	34.4	2,954	26.6	3,182	24.8	2,701	23.2	3,351	32.3	
White: Irish	404	3.3	208	1.9	241	1.9	334	2.9	365	3.5	
White: Gypsy or Irish Traveller	11	0.1	10	0.1	13	0.1	23	0.2	1	0.0	
White: Other White	1,174	9.6	668	6.0	887	6.9	878	7.5	873	8.4	
Mixed/multiple ethnic groups: White and Black Caribbean	157	1.3	103	0.9	194	1.5	135	1.2	97	0.9	
Mixed/multiple ethnic groups: White and Black African	68	0.6	21	0.2	72	0.6	66	0.6	44	0.4	
Mixed/multiple ethnic groups: White and Asian	259	2.1	119	1.1	173	1.3	225	1.9	199	1.9	
Mixed/multiple ethnic groups: Other Mixed	162	1.3	118	1.1	140	1.1	138	1.2	125	1.2	
Asian/Asian British: Indian	2,339	19.1	3,096	27.8	2,383	18.6	2,301	19.7	2,343	22.6	
Asian/Asian British: Pakistani	344	2.8	392	3.5	447	3.5	415	3.6	378	3.6	
Asian/Asian British: Bangladeshi	40	0.3	130	1.2	99	0.8	116	1.0	56	0.5	
Asian/Asian British: Chinese	200	1.6	140	1.3	80	0.6	122	1.0	131	1.3	
Asian/Asian British: Other Asian	1,423	11.6	2,306	20.7	2,836	22.1	2,529	21.7	1,235	11.9	
Black/African/Caribbean/Black British: African	413	3.4	210	1.9	827	6.4	498	4.3	364	3.5	
Black/African/Caribbean/Black British: Caribbean	415	3.4	258	2.3	518	4.0	511	4.4	300	2.9	
Black/African/Caribbean/Black British: Other Black	211	1.7	120	1.1	392	3.1	321	2.8	202	1.9	
Other ethnic group: Arab	237	1.9	111	1.0	179	1.4	174	1.5	180	1.7	
Other ethnic group: Any other ethnic group	189	1.5	160	1.4	165	1.3	176	1.5	129	1.2	
Main Ethnic Groups											
White	5,813	47.4	3,840	34.5	4,323	33.7	3,936	33.7	4,590	44.2	
Mixed/multiple ethnic groups	646	5.3	361	3.2	579	4.5	564	4.8	465	4.5	
Asian/Asian British	4,346	35.4	6,064	54.5	5,845	45.6	5,483	47.0	4,143	39.9	
Black/African/Caribbean/Black British	1,039	8.5	588	5.3	1,737	13.5	1,330	11.4	866	8.3	
Other ethnic group	426	3.5	271	2.4	344	2.7	350	3.0	309	3.0	
In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.											