

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a ‘relevant protected characteristic’ and those without one;
- Fostering good relations between those with a ‘relevant protected characteristic’ and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Alternative Provision
Service area	Commissioning
Officer completing assessment	Ngozi Anuforo
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	10 th March 2020
Director/Assistant Director	Charlotte Pomery

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed
- The key stakeholders who may be affected by the policy or proposal
- The decision-making route being taken

The policy informing the proposal under consideration in this impact assessment is the development and implementation of a change model for the future provision of alternative education in Haringey. The change model seeks to reshape how the Council, Schools and partner agencies and services in the borough work together with children, young people and their parents to reduce the number of children and young people at risk of exclusion from mainstream school, or who are excluded from mainstream schools, in the borough. The change model also seeks to improve the scope and range of alternative education provision offered in the borough, with a specific focus on ensuring access to support and enrichment is available to children, young people and their families at the earliest opportunity. The elements within the change model broadly affect several key stakeholders including children, young people, parents, carers, schoolteachers and support staff and providers of alternative provision both inside and outside of the borough.

A specific proposal within the change model is the redesign of the two existing Pupil Referral Units in Haringey (The Octagon and The Tuition Service) and the development of a new alternative provision hub within the borough. This development will specifically affect the pupils currently accessing the two PRUs, staff and the parents and carers and is the focus of this EqlA.

The detail of all the proposals within the change model is set out in a report and associated paper which will be presented to the Council’s Cabinet on the 10th March 2020 for approval.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Data used to assess the impact of the proposal on protected groups of services users and staff has been drawn from the data held at service level within each of the PRUs. The data review considered the learners currently accessing the two PRU provisions, as well as the staffing profiles for each setting.

Additional data has been drawn from the Haringey Stat on Serious Youth Violence, Haringey Schools data, PRU pupil data

Protected group	Service users	Staff
Sex	Haringey Pupil Referral Unit Data	X
Gender Reassignment	Equalities and Human Rights Commission	
Age	Haringey Pupil Referral Unit data	

Disability	Haringey Pupil Referral Unit data Census 2011	
Race & Ethnicity	Haringey Pupil Referral Unit data	
Sexual Orientation	Office for National Statistics	
Religion or Belief (or No Belief)	Census 2011	
Pregnancy & Maternity	Office for National Statistics	
Marriage and Civil Partnership		

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

A review of data told us that in Oct 2018, 70% of all young offenders in the borough had had a fixed term exclusion from school and approximately 10% of all young offenders had been permanently excluded from school. At the same period, 77% of pupils attending alternative education provision were recognised as having a special education need or disability. Approximately half were recognised as having a social, emotional or mental health need.

The review of current service user data across the two PRUs has highlighted the following:

Sex

The Octagon

SEX	
Male	Female
74%	26%

The Tuition Service

GENDER	
Male	Female
51%	49%

The data indicates that the majority of pupils in PRUs in Haringey are male.

Gender Reassignment

A surveillance study examining the incidence and clinical presentation of Gender Dysphoria in children and adolescents aged 4 to 15 years suggests an incidence of 1.6 per 100,000 in the UK. A significant limitation of this surveillance study is that it only captured

data for those presenting between their 4th and 16th birthdays - meaning that it is not possible to comment on the incidence of gender dysphoria among 16 and 17 year olds, which referral trends to the service suggest have significantly increased the overall incidence rate. This figure only reflects those who presented to NHS paediatric or psychological services and not those who have chosen not to, or who have been unable to access this care. The figure does not reflect the total number who may have accessed their GP regarding their gender dysphoria, or include those who have elected to seek private support.

Age

Due to the nature of the service, all those in Pupil Referral Units are children.

Disability

The Octagon

DISABILITY	
Proportion of Pupils with an identified Special Educational Need or Disability	
EHCP	SEN Support
3%	97%

The Tuition Service

DISABILITY		
Proportion of Pupils with an identified Special Educational Need & Disability		
EHCP	SEN Support	No SEN
27%	62%	11%

Census 2011 data indicates that 4% of the under-24 population in Haringey have their day-to-day activities limited a little or a lot due to a disability or long-term health condition. It is therefore apparent that disabilities are more common among pupils in pupil referral units.

Race and Ethnicity

The Octagon

RACE & ETHNICITY	
White British	5%
White Other	6%
Black British - African	15%
Black British - Caribbean	19%
Turkish	7%
Mixed Ethnicity	23%
Other Ethnicities	8%

The Tuition Service

RACE & ETHNICITY	
White British	49%
White Other	13%
Black British - African	2%
Black British - Caribbean	6%
Black Other	3%
Mixed Ethnicity	19%
Other Ethnicities	8%

Census 2011 data indicates that BAME communities form 80.3% of Haringey's school children, significantly above the proportion for the borough as a whole. The Pupil Referral Unit data indicates that BAME children are overrepresented in The Octagon, whereas White British pupils are overrepresented in the Tuition Service.

Religion

The Census 2011 show 45% of Haringey residents were Christian, slightly less than 48.4% in London overall. Second most common religion stated was Muslim (14.2%) followed by Jewish (3%) and Hindu (1.8%).

Census 2011 data indicates that 42% of 8-19 year-olds in Haringey are Christian, 23% are Muslim, 4% are Jewish, 1% are Buddhist, 1% are Hindu, fewer than 1% are Sikh, and 19% have no religion.

Sexual Orientation

We do not hold ward-level or borough-level data on sexual orientation, and it is not collected nationally through the census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country. We will need to ensure that the inequalities and discrimination experienced by LGB people are considered throughout this EqIA.

Office for National Statistics data indicates that at a national level young people are more likely to identify as LGB than the population as a whole. Within the 16 to 24 year old category 3.3% identify as LGB, compared to 1.7% of the general population. The data also indicates that London has a higher proportion of residents identifying as LGB than the national population.

Pregnancy and Maternity

ONS data on under 18 conception rates in the year to September show an under-18 conception rate in Haringey 2016 of 20.3 per 1000 compared to the rate for London (17.9 per 1000) and for England and Wales (19.3 per 1000).

1. The profile of staff was considered to understand where there may be instances of disproportionality.

a) The Octagon – staff profile as at February 2019

Male	Female
38%	62%

RACE & ETHNICITY	
White British	34%
White Other	8%
Black British - African	4%
Black British - Caribbean	42%
Black Other	4%
Asian	4%
Other Ethnicities	4%

DISABILITY

There was limited data available but the information that reviewed showed that the number of staff with a disability was less than 5.

RELIGION

There no data available for this characteristic.

b) The Tuition Service - staff profile as at February 2020. Data for this pending and we will be taking steps to assess impact further once this has been received.

Male	Female

RACE & ETHNICITY	
White British	
White Other	
Black British - African	
Black British - Caribbean	
Black Other	
Mixed Ethnicity	
Other Ethnicities	

DISABILITY

There was limited data available but the information that reviewed showed that the number of staff with a disability was less than 5.

RELIGION

There no data available for this characteristic.

Comment

The largest proportion of staff affected by the proposal are female.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

It is acknowledged that the actions outlined within the proposed change model will be implemented over a period of two to three academic years. Elements of the plan are expected to be shaped by the on-going engagement of schools, parents/carers and young people in co-production and design, as well as consultation on key aspects of the plan, ahead of full implementation.

Groups targeted for engagement and consultation are set out below:

- Children and young people
- Parents and carers
- Staff

Engagement with schools in the borough commenced in Autumn 2019 and remains ongoing. This has involved individual discussions with Secondary Schools and Further Education providers, discussions through Primary and Secondary Forums and via an ongoing Alternative Provision Review Group which comprises of key stakeholders affected by, and able to contribute, to the proposed change model.

The engagement programme with parents and carers has commenced and will continue. We are keen to engage with as many parents and carers as possible and will work through existing services to reach those parents and carers. Some initial surveying activity demonstrated a need to hold more direct conversations with parents and carers and these will be undertaken through one to one telephone conversations and a proposed focus.

The targeted engagement of young people will be a focused programme of activity concerned with ensuring the voice of young people is central to how the change model evolves and is implemented. The programme of activity will take into account the individual needs of pupils, ensuring that provision is made for those with Special Educational Needs and Disabilities (SEND) or if there is a need to support participation in consultation such as the use of translators or advocates.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation’s findings will shape and inform your proposal and the decision-making process, and any modifications made?

Consultation and engagement activities remain on-going and will continue to target the groups outlined in section 4.a).

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex – The larger majority of learners affected by the changes are male. It is recognised that this is a consequence of the disproportionate representation of males in PRU services. The redesign of the current provision is not expected to change the offer currently being made in a way that will have a negative impact on this group.

Positive		Negative		Neutral impact	X	Unknown Impact	
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2. Gender reassignment - – data on this area was not available at the time of review. The impact on those within this protected characteristic is, as yet, unknown. The continued programme of engagement and consultation will seek to understand and assess any impact of the proposals on this group.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age – There are two groups who will be significantly affected by the proposals are young people and adults. The young people are current users of the provision and are all under 16 years of age. The adult group comprises of staff and parents/carers. The age profile of the parents and carers affected by these changes is not yet known and this information will continue to be gathered. It is anticipated that the proposals will have a positive impact on young people and their parent/carers as a result of an improved service

offer and access to support.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability - It is anticipated that the proposals will have a positive impact on those pupils with SEND as a result of an improved assessment and referral processes and access to support.

Positive	X	Negative		Neutral impact		Unknown Impact	
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5. Race and ethnicity – The data suggest that residents from black and minority ethnic groups will be significantly affected by the proposals among both young people and adults. The young people are current users of the provision and the adult group comprises of staff and parents/carers. At present, the race and ethnicity profile of the parents and carers affected by these changes is not yet fully known and this information will continue to be gathered. It is anticipated that the proposals will have a positive impact as a result of an improved service offer and access to support.

Positive	X	Negative		Neutral impact		Unknown Impact	
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6. Sexual orientation – data on this area was not available at the time of review. The impact on those within this protected characteristic is, as yet, unknown. The continued programme of engagement and consultation will seek to understand and assess any impact of the proposals on this group.

Positive		Negative		Neutral impact		Unknown Impact	X
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7. Religion or belief (or no belief) – data on this area was not available at the time of review. The impact on those within this protected characteristic is, as yet, unknown. The continued programme of engagement and consultation will seek to understand and assess any impact of the proposals on this group.

Positive		Negative		Neutral impact		Unknown Impact	X
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8. Pregnancy and maternity – data on this area was not available at the time of review. The impact on those within this protected characteristic is, as yet, unknown. The continued programme of engagement and consultation will seek to understand and assess any impact of the proposals on this group.

Positive		Negative		Neutral impact		Unknown Impact	X
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9. Marriage and Civil Partnership – data on this area was not available at the time of

review. The impact on those within this protected characteristic is, as yet, unknown. The continued programme of engagement and consultation will seek to understand and assess any impact of the proposals on this group.

Positive		Negative		Neutral impact		Unknown Impact	X
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10. Groups that cross two or more equality strands e.g. young black women

Data and demographic information suggest that the proposal will have an impact on the group characterised as young black males. This is reflected in the disproportionate representation of this group, as against the wider pupil population in Haringey, amongst the numbers of pupils permanently excluded from school or accessing alternative education provision.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

It is anticipated that the proposals will help to tackle the disproportionate impact of school exclusion on boys from black and minority ethnic backgrounds. The approach set out in the change model seeks to tackle discriminatory practice, increase transparency around the movement of pupils in and out of mainstream education and improve inclusive practice across the education system in Haringey. By building, and maintaining, the engagement of those groups most negatively affected by school exclusion through the change period, our approach will seek to encourage greater participation in education of those groups in the borough sharing protected characteristics and reduce current levels of disadvantage.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
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No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
N/A			

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

6 c) Summarise the measures you intend to put in place to monitor the equalities

impact of the proposal as it is implemented:

As part of the implementation of this proposal, plans will be put in place to collect and collate information about impact, within a wider approach to monitoring and evaluation the effect of the change plan on the education system in Haringey. The impact on the groups affected by the changes will be tracked and qualitative and quantitative data will be used to identify any unintended consequences of the changes or adverse effect for any group.

In order to measure the equalities impact, data will be collected on a termly basis via school census information and a school HR profile data.

7. Authorisation

EqlA approved by (Assistant Director/ Director)	Date
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8. Publication
Please ensure the completed EqlA is published in accordance with the Council's policy.

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Please contact the Policy & Strategy Team for any feedback on the EqlA process.