

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area:
Directorate:

(a) This EIA is being completed for a...

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(b) Please name and describe below...

Education Other Than At School (EOTAS) Provision

Following a decision by Cabinet in January 2017 the EOTAS provision is being extensively overhauled to ensure future provision best meets the needs of vulnerable young people. The Council will be:

1. extensively overhauling its entire EOTAS service to provide sector-leading practice;
2. reducing the capacity of Swansea PRU in recognition of increased devolution of funding and responsibility to schools. The needs of the majority of learners with social, emotional and behavioural difficulties (SEBD) will be met through mainstream education, with central provision only being made for those learners with the most severe SEBD needs;
3. developing a multi-agency support team to provide support for young people, their schools and their families;
4. overhauling its behaviour and wellbeing strategy to support the needs of the majority of learners with SEBD through mainstream education;
5. restructuring Swansea PRU into three strands (including a 'halfway house') educated in fit-for-purpose learning environments. Initially the 'halfway house' will be a mobile provision delivered at the learner's host school. This will provide intensive support over a period of time to assist the learner to be re-integrated fully into school life;
6. securing permanent senior leadership positions for the Head of Swansea PRU (now appointed), Deputy Head of PRU and managers for two of the centres and for the support team;
7. creating a new 'early move' protocol in an overhaul of the existing 'managed move' protocol;
8. carrying out a full feasibility study on a site in Cockett to determine if it is feasible to build the Swansea PRU here;
9. using additional corporate capital funding (subject to a full feasibility study) in relation to the possible accommodation; and
10. using corporate revenue funding to support additional staff, devolved funding to schools and "managed move" transport costs.

(c) It was initially screened for relevance to Equality and Diversity on 10/11/2016.

(d) It was found to be relevant to...

- | | | | |
|------------------------------------|-------------------------------------|----------------------------------|-------------------------------------|
| Children/young people (0-18) | <input checked="" type="checkbox"/> | Religion or (non-)belief..... | <input checked="" type="checkbox"/> |
| Any other age group (18+)..... | <input checked="" type="checkbox"/> | Sex..... | <input type="checkbox"/> |
| Disability | <input checked="" type="checkbox"/> | Sexual orientation | <input type="checkbox"/> |
| Gender reassignment | <input type="checkbox"/> | Welsh language | <input checked="" type="checkbox"/> |
| Marriage & civil partnership | <input type="checkbox"/> | Poverty/social exclusion..... | <input checked="" type="checkbox"/> |
| Pregnancy and maternity..... | <input type="checkbox"/> | Carers (inc. young carers) | <input type="checkbox"/> |
| Race | <input checked="" type="checkbox"/> | Community cohesion | <input checked="" type="checkbox"/> |

(e) Lead Officer

Name: Rhodri Jones

Job title: Head of Stakeholder Engagement Unit

Date (dd/mm/yyyy): 10/03/17

(f) Approved by Head of Service

Name: Nick Williams

Date (dd/mm/yyyy): 01/04/17

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The City and County of Swansea is seeking to extensively overhaul its entire EOTAS Service to ensure future provision best meets the needs of vulnerable young people.

Who has responsibility?

Cabinet
Chief Executive
Director of People
Chief Education Officer
Head of School Support Services
Head of Swansea PRU

Who are the stakeholders?

EOTAS Learners
EOTAS Staff
EOTAS Parents
All Headteachers
All Governing Bodies
School Councils
Education School Support Service
Education Senior Leadership Team
Cabinet Member for Education
Leader
All Councillors
SNAP Cymru
Social Services
CAHMS

Section 2 - Information about Service Users (See guidance):

Please tick what information you know about your service users and provide details/evidence of how this information is collected.

Children/young people (0-18)	<input checked="" type="checkbox"/>	Carers (inc. young carers)	<input type="checkbox"/>
Any other age group (18+).....	<input type="checkbox"/>	Race.....	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Religion or (non-)belief.....	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Sex.....	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Pregnancy and maternity	<input checked="" type="checkbox"/>	Welsh language	<input checked="" type="checkbox"/>

What information do you know about your service users and how is this information collected?

Pupil information – SIMS which is linked with the Authority's 'CAPITA One' system which gives more detailed information about pupils. This is managed by the local authority to ensure that the needs are met of all pupils in all schools within the City & County of Swansea.

General information about schools is collected in January every year as part of the National Census (PLASC).

The statistics for pupils accessing EOTAS services are as follows:

Setting	Learner Numbers (2016/2017)
Step Ahead	26
Key Stage 4	11
Arfryn	49
Pathways	44
Out Of County	20
Total	150

Age	Boys	Girls
16	2	0
15	33	16
14	16	9
13	18	7
12	9	4
11	7	1
10	4	0
9	4	2
8	8	1
7	2	0
6	2	0
5	0	0
4	0	0
3	2	0
Total	110	40

Nationality	Number of learners aged 5 or over at 31 August 2016
Welsh	59
English	10
Scottish	1
Irish	0
British	51
Other	2
Refused	0
Not supplied	25

Ethnic Group	Number of learners aged 5 or over at 31 August 2016
Asian and any other ethnic group	1
Information Not Yet Obtained	6
Iraqi	1
Occupational Traveller	2
Other Ethnic Group	1
Pakistani	1
White British	135
White and any other ethnic group	1

Free School Meals

65 learners are eligible for free school meals

Statement of Special Educational Needs

41 learners have an SEN statement

Any Actions Required?

- Seek to collect information on carers and religion to ensure that the needs of all children and young people are met.
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Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18) →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group (18+) →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief →	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh language →	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers) →	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

Children/Young People

The proposed changes will see the quality of the provision improved. The proposed new setting will provide learners with a fit for purpose environment and the introduction of a half-way house will make it easier for learners to return to their designated school as soon as possible.

Any other age group

The proposed changes will provide staff with a fit for purpose environment to deliver these much needed services. The new management structure will also allow staff to develop to provide the best possible service to their learners/.

Disability (Additional Learning Needs)

38 of the current cohort of EOTAS pupils have a statement of special educational needs. Once again the proposed provision of new fit for purpose buildings will ensure that every learner receives the service in a fit for purpose location under the leadership of an improved team.

Pregnancy and maternity

This group is currently catered for by the EOTAS service. The change will provide this group of young people with a safer more inclusive environment.

Sex

The proposed changes will see the quality of provisions for both boys and girls maintained if not improved.

Welsh Language

Welsh speaking pupils are not a big user of this service currently. Individual arrangements have been made in the past and will continue to be made should the need arise.

Carers

All young carers will continue to have the same access to this service as they have done in the past.

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support your view? Please provide details below.

In April 2016 engagement sessions were held with parents, carers and learners at all the various settings. Discussions were held on what kind of provision they would like to see under the EOTAS service. Following these sessions a visioning workshop was held in May 2016 with a wide range of stakeholders to start shaping what the future service could look like.

Following the approval by Cabinet (January 2017) of the direction of travel further sessions were held with parents, carers and learners (February 2017) before delivering the agreed action plan.

Consultation sessions were held with stakeholder groups early in the spring term in order to obtain their opinions on the proposed future direction of travel as agreed by Cabinet in December 2016. The Head of Learner Support Services gave presentations to stakeholder groups and all feedback was recorded.

Stakeholder feedback to the development of a new behaviour and wellbeing strategy with an overhaul of current systems and practice in dealing with vulnerable pupils was well received and generally positive.

Themes emerging focused primarily on staffing, teaching approaches and the suitability and sufficiency of the new accommodation. Each key issue raised has been responded to as part of the Cabinet paper.

All stakeholders will continue to be involved as plans are developed for the new setting in Cockett and as the wider plans for the service are delivered.

Any actions required (to mitigate adverse impact or to address identified gaps in knowledge).

- Continue to involve all stakeholders in the design and implementation of these proposals.
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Section 4 - Other Impacts:

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

(Please see the specific Section 4 Guidance for definitions on the above)

Please explain any possible impact on each of the above.

Foster good relations between different groups

The new EOTAS structure including a new Head of Swansea PRU should make it easier to foster good relations between the various sections of EOTAS and will also provide a figurehead to have discussions and dialogue with key partners including the parents, carers and learners.

Advance equality of opportunity between different groups

The proposal allows the different groups of pupils who find attending mainstream school difficult because of their social emotional and behaviour/ anxiety/medical issues to continue to have their needs met through provision made outside of their mainstream school but also encourages, where possible, for the learners to return to their designated school and achieve to the best of their ability.

Elimination of discrimination, harassment and victimisation

The whole service works towards this end and the proposals will not deviate from this goal.

Reduction of social exclusion and poverty

These proposals will provide better services and a better provision to ensure that children and young people are kept in education and given the best change possible of reaching their potential.

What work have you already done to improve any of the above?

This has been an on-going process of seeking improvements in the EOTAS Service and this proposal is the next step in seeking improvements.

Is the initiative likely to impact on Community Cohesion (see the guidance for more information)?

The Service will hopefully re-locate to Cockett. We will be working in the community with the local school, police station and residents to ensure that the PRU can play a full part in its new community.

How will the initiative meet the needs of Welsh speakers and learners?

Welsh medium pupils will continue to receive their education through the medium of Welsh as is required.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

- Create links in the community if/when the new provision is designed and delivered in Cockett

Section 5 - United Nations Convention on the Rights of the Child (UNCRC):

In this section, we need to consider whether the initiative has any direct or indirect impact on children. Many initiatives have an indirect impact on children and you will need to consider whether the impact is positive or negative in relation to both children's rights and their best interests

Please visit <http://staffnet/eia> to read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people? If not, please briefly explain your answer and proceed to Section 6.

Yes

Is the initiative designed / planned in the best interests of children and young people? Please explain your answer.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Yes, the initiative is designed in the best interest of children and young people and will ensure children and young people access their right to achieve the goals of education and become the best they can be (Article 29). These proposals seek to ensure that the quality of the provision offered to EOTAS pupils is improved ensuring all children and young people in Swansea have access to educational provision enhancing children and young people's right to education and to learn and go to school (Article 28).

Other articles relating to these proposals are as follows:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 23 - Children who have any kind of disability should have special care and support so that they can lead full and independent lives.

Article 30 - Children have a right to learn and use the language and customs of their families.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

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Section 6 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor this initiative:

Monitoring arrangements: An EOTAS Steering Group is in place to ensure that the various strands of the proposals are delivered. Any issues can be escalated to the QEd Strategy Board or the Education Senior Leads Board.

Actions: Regular meetings of the EOTAS Steering Group

Section 7 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern

Outcome 2: Adjust the initiative – low level of concern

Outcome 3: Justify the initiative – moderate level of concern

Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 8 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – acesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Seek to collect information on carers and religion to ensure that the needs of all children and young people are met.	Head of Stakeholder Engagement Unit Head of Swansea PRU	July 2017	Data collected (if any) and actions proposed	
Continue to involve all stakeholders in the design and implementation of these proposals.	Head of School Support Service	Ongoing	Learners and other stakeholders playing a part in the design and build	
Create links in the community if/when the new provision is designed and delivered in Cockett	Project Manager Head of Swansea PRU	December 2017	Local community supportive of the development	
Regular meetings of the EOTAS Steering Group	Project Manager	Monthly	Regular meetings held and decisions taken	

* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).