

## Full Equality Impact Analysis Template – Introduction

This **Full EqIA Template** should be read in conjunction with the **EqIA Guidance Document** [\(link\)](#) which supports completion of all EqIA related documentation.

A separate **EqIA Screening Template** [\(link\)](#) is also available. This can be used to determine whether a full EqIA is necessary, as this may be unclear initially.

### Conducting an Equality Impact Assessment (EqIA)

We use an Equality Impact Assessment (EqIA) to help us determine whether our plans and activities will affect equality outcomes for different groups of employees (where the activity is employment related) OR for different communities (where the activity is related to service delivery or the exercise of our functions). It helps assess whether the impacts will be positive, negative or unlikely to have a significant impact on each protected characteristic<sup>1</sup> group. The core purpose of carrying out an EqIA is therefore to:

- a) **analyse a proposed activity** i.e. policy/ strategy/ process/ function / service/ restructure/ programme etc (hereafter referred to as *proposed activity*) against the three specific requirements of the Duty (above), AND
- b) **use the outcomes of that analysis** to inform further decision/s and action aimed as mitigating potential adverse impacts, or else to provide clear justification for continuing with a proposed course of action.

The Public Sector Equality Duty (PSED) states that a public authority **must**, in the exercise of its functions, have due regard to the need to:

1. **Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
2. **Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
3. **Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Using this Full EqIA Template (pp.3 – 6) to carry out a thorough and considered EqIA will ensure that the Council remains compliant with PSED requirements **and** help ensure we avoid or mitigate / minimise adverse impacts on certain groups.

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<sup>1</sup> People who share one (or more) of 9 *protected characteristics* (PCs) are protected from unlawful discrimination, victimisation and harassment under the Equality Act (2010). These groups are referred to as 'protected characteristic groups' in this and related documentation. The 9 PCs are: Age; Disability; Ethnicity; Gender re-assignment; Marriage & Civil Partnership; Pregnancy& Maternity; Religion/ belief; Sex; Sexual orientation.

## Governance

- Key Decision Reports (KDRs) MUST always have either an initial screening assessment OR a full EqIA, which must be signed off by Head of Service and Lead Member and be submitted alongside the KDR for approval and scrutiny. Any equalities issues should be fully addressed and cross referenced as appropriate in the Report
- Budget proposals MUST always have either an initial screening assessment OR a full EqIA, which must be signed off by Head of Service

## General points

The following principles should be borne in mind when conducting an EqIA

- **Timeliness:** the duty to assess potential impacts **applies at the time of considering proposals** and **before** a final decision is taken.
- **Consideration:** the duty to assess and consider must be an integral and rigorous part of your decision-making and influence the process.
- **Initial Screening:** A full EqIA is not always necessary, but this may not be immediately obvious. Use the EqIA Screening Template [\(link\)](#) if you are unsure, to help you determine what level of assessment is needed. The initial scoping must still be recorded as evidence of 'due regard'.
- **Sufficient Information:** we must evaluate what information we have and think about what more might be needed to give proper consideration.
- **Breadth:** Where dealing with obvious equalities issues e.g. changing services to specific groups such as disabled people or children for example, care must be taken not to lose sight of other less obvious issues for other protected characteristic groups.
- **Review:** the Equality Duty is a 'continuing duty'. This means it continues to apply **after** proposals are implemented/reviewed. Monitoring is key.
- **Record Keeping:** we must keep records of the EqIA process, any impacts identified and what we plan to do as a result.

Failure to fully consider the above when conducting an EqIA (and in any decision based on that), may leave the Council open to legal challenge, cause considerable delay and lead to financial and/or reputational damage

If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the relevant ED&I Officer/ Lead for support and advice (see below).

If your EqIA does not require you to carry out additional consultation (with either employees or community groups), please omit section 04.

Further advice and guidance **should** be accessed from the separate EqIA Guidance document [\(link\)](#), as well as from your service or borough lead:

### **RBKC**

For external facing EqIAs: Corporate Equalities Officer: [angela.chaudhry@rbkc.gov.uk](mailto:angela.chaudhry@rbkc.gov.uk) Tel: 020 7361 2654

For internal facing EqIAs: Strategic ED&I Lead (HR): [amanda.rice@rbkc.gov.uk](mailto:amanda.rice@rbkc.gov.uk) Tel: xxxxxxxxxxxxxx

## Equality Impact Analysis Template

Section 01: Overall Information	Details of Full Equality Impact Analysis
<b>Financial Year and Quarter</b>	2021 First Quarter
<b>Name &amp; details of proposed activity</b> (i.e. the policy/ strategy/ process/ function / service/ restructure/ programme etc) to be assessed - hereafter referred to as ' <i>proposed activity</i> '	<p>Title of EIA: School Inclusion Strategy</p> <p>Over the past five years there has been an increase, nationally and locally, in the rate of both permanent and fixed term exclusions from schools. Our most vulnerable children and young people are at a greater risk of being placed outside of mainstream education and a school exclusion can be a key turning point in a child's or young person's life, often resulting in even poorer life chances. As two boroughs with outstanding Children's Services, we have the opportunity to lead by example when it comes to presenting a strong leadership narrative that celebrates what is working well locally and presents an ambitious vision for schools and services to work together.</p> <p>The strategies key function is to: Reduce the number of children and young people being removed from mainstream education as a result of their behaviour. Improve outcomes for children and young people who are disproportionately affected by exclusion. Drive a whole system commitment to work with children and young people at risk of exclusion in a trauma informed way.</p> <p>The strategy has been informed through consultation and focus groups with a range of stakeholders, including schools, parents, children and young people and community organisations.</p>
<b>Lead Officers</b> (i.e. those responsible for /managing the proposed activity)	<p>Name: Laura Gregory            Position: Strategic Transformation Lead            Email: <a href="mailto:laura.gregory@rbkc.org.uk">laura.gregory@rbkc.org.uk</a>            Telephone No:</p>
<b>Single or BI-Borough</b>	Bi-borough EqIA
<b>Date of completion of final Full EqIA</b>	02 / 03/ 2021

Section 02	Scoping of Full EqIA
<b>Plan for completion</b>	<p>Timing: It is anticipated that the strategy will be launched in the Spring term of the 2020/21 academic year, however this timescale may be impacted by Covid-19 as schools will rightly need to prioritise responding to the changing guidance in relation to the virus. Following the launch of the strategy there will be further work to develop an action plan for how the priority</p>

areas identified through the strategy will practically be taken forward. The ambition is for the action plan to begin being implemented from September 2021.

Resources:

**Analyse the impact of the proposed activity**

Analyse the impact of the proposed activity on the protected characteristic groups (including where people / groups may share more than one protected characteristic). You should use this to determine whether the proposed activity will have a positive, neutral or negative impact on equality, giving due regard to **relevance and proportionality**.

(See guidance for more information on relevance and proportionality)

Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
Age	<p>Whilst fixed and permanent exclusions from Bi-borough primary schools have come down in recent year, the rates of exclusion from secondary schools in both boroughs have risen above the Inner London and national exclusion rates.</p> <p>Reasons for this include smaller settings at primary level, better relationships between parents and teachers as children tend to have one teacher for the whole year, and parents are more likely to come in contact with teachers at pick up and drop off, whereas at secondary level schools are much bigger, and students have many teachers. This means that students with additional needs or vulnerabilities can sometimes be fully supported in their primary schools but don't get enough targeted support in the secondary environment. The strategy aims to reduce exclusions from secondary schools by strengthening information sharing between primary and secondary schools, particularly where there are additional needs, and improving the communication and relationships between secondary school staff and parents, resulting in all parties having a fuller picture of all that is going on for a child and that home and school can be working together to address issues as they arise.</p>	Positive
Disability	<p>Children with SEN support, and those with SEMH as their primary identified need are currently more likely to be removed from mainstream education as a result of their behaviour than their peers. The strategy aims to reduce the overrepresentation of these groups in the excluded cohort by improving access to early intervention support services and through greater LA oversight and management of all exclusions so that unaddressed needs are not misinterpreted as behaviour issues and the appropriate support can be put in place for the child and for their family.</p>	Positive

	Gender reassignment	Whilst gender reassignment data is not currently gathered for our excluded cohort, we recognise that it is possible these characteristics may have an impact on individuals' risk of exclusion. This is therefore a point of further enquiry to be actioned.	Positive
	Marriage and Civil Partnership		
	Pregnancy and maternity	Whilst girls are less likely to receive formal exclusions than boys there have been instances of girls being educated in Bi-borough alternative provision (AP) who were pregnant. There could have been a range of factors that led to these placements being arranged in the past however, arguably attending the same education setting as all other young people removed from mainstream education as a result of their behaviour is not appropriate for someone who is pregnant. The Inclusion strategy will seek to diversify the range of provision that is available for Bi-borough children and young people to ensure that settings can be chosen with their best interests in mind.	Positive
	Race	Certain ethnicities are overrepresented in the excluded cohort across both boroughs. For RBKC Black Caribbean, any other Mixed Background and Bangladeshi are most overrepresented. In WCC any other Ethnic Group, White British and Black Caribbean are most overrepresented. The strategy aims to reduce this overrepresentation through training for school staff and other frontline professionals around unconscious biases, and working with schools to make sure their behaviour policies are not singling out behaviours for punishment that unfairly affect certain cultures e.g. kissing teeth. The strategy will also seek to remove any cultural barriers to engaging with support services by considering who is best placed to deliver these services, and from which settings, e.g. upskilling local community organisations to advocate for families and to provide legal advice, and ensuring inclusion and behaviour policies are available in a range of languages and accessible formats.	Positive
	Religion/belief (including non-belief)	Whilst religion and belief data are not currently gathered for our excluded cohort, we recognise that it is possible these characteristics may have an impact on individuals' risk of exclusion. This is therefore a point of further enquiry to be actioned.	Positive
	Sex	Boys are significantly more likely to be excluded from school than girls. The Strategy aims to raise awareness among school staff and other front-line professionals of some of the underlying issues that are more likely to present as disruptive behaviour in boys, and therefore intervene in a more effective way to address these underlying issues and reduce the risk of exclusion.	Positive

Sexual Orientation	Whilst sexual orientation data is not currently gathered for our excluded cohort, we recognise that it is possible these characteristics may have an impact on individuals' risk of exclusion. This is therefore a point of further enquiry to be actioned.	Positive
<p>The following groups are not specifically protected by the Equality Act, but RBKC considers them as part of our broader approach to supporting equal outcomes for communities that may be disadvantaged, marginalised or excluded. Please consider whether they may be impacted.</p>		
Socio-economic	Parts of both boroughs have some of the highest levels of deprivation in the country and the Bi-borough has a higher proportion of children eligible for free school meals (FSM) than elsewhere (24% RBKC, 27% WCC, 17% England). Published research has demonstrated the link between deprivation and school exclusion, and in RBKC and WCC the highest numbers of exclusions are for children and young people who live in the areas with the highest level of deprivation. The inclusion strategy will seek to address this inequality through targeted work with schools in deprived areas, and through some of the actions listed against the other protected characteristics in this table that often confound and are confounded by deprivation.	Positive
Geographical	In RBKC 61% of fixed terms exclusion were for residents of only four wards in located in the North of the borough (Notting Dale, Golborne, Colville & Dalgarno). In Westminster, 64% of all fixed term exclusions were for residents of only four wards (Church St, Westbourne, Harrow Rd, Queen's Park). This correlates with these wards having high levels of deprivation as referenced above. Targeted interventions will be put in place with schools in these areas and children and young people who live in these wards.	Positive
Carers	<b>RBKC</b> i.e. those who act as primary carer for an adult or for a disabled child	
Other relevant groups:	<b>RBKC</b> Please stipulate which group/s and why	
<p><b>Human Rights &amp; Children's Rights</b></p>		
<p>Does your proposal impact on Human Rights as defined by the Human Rights Act 1998? (See guidance for more information on this)</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>		

	<p>Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Borough Lead for advice.</p>	

<b>Section 03</b>	<b>Analysis of relevant data</b>
<b>Documents and data reviewed</b>	<p>Examples of data include census data; customer satisfaction surveys; customer complaints data workforce demographic data. Data should involve specialist data and information and, where possible, should be disaggregated by different protected characteristics.</p> <p>As outlined above, permanent and fixed term exclusions across the bi borough have increased and risen above the inner London and National rates. There are clear inequalities in the excluded cohort indicating some characteristics are disproportionately affected;</p> <p>Disability – The rate of students in AP with SEN support is much higher locally than in other areas. The proportion of pupils in the excluded population with SEN support stands at 89.8% in Westminster and 93.8% in RBKC, this is above the London average of 64.9%. This trend suggests that some children and young people in Westminster and RBKC are being placed into AP with unidentified or unmet specialist needs.</p> <p>Race – Across the bi-borough children and young people from certain ethnic backgrounds are disproportionately affected by exclusions. Children and young people from BAME backgrounds are more likely to receive a fixed term exclusion standing at 6.8% in WCC and 8.0% in RBKC, compared to the National average of 3.9%. In both boroughs, the proportion of children and young people from black Caribbean backgrounds is around 2.5 times higher in AP than in our mainstream secondary population and are therefore over-represented in the excluded cohort.</p> <p>Sex – Boys are overrepresented in the excluded cohort, making up over 70%. This is replicated across London, as well as Nationally.</p> <p>Much of the data that has informed the inclusion strategy and the Equality Impact Assessment has been drawn from nationally published reports from the Department for Education (latest published figures can be found here <a href="https://explore-education-statistics.service.gov.uk/find-statistics">https://explore-education-statistics.service.gov.uk/find-statistics</a>) as well as from information that is collected by our Bi-borough Children’s Services Business Intelligence team and from monitoring returns submitted to contract managers from the Alternative Provision academies in RBKC and WCC.</p>
<b>New research</b>	<p>If new research is required, please complete this section</p>

<b>Section 04</b>	<b>Consultation</b>
	Complete this section if you have decided to supplement existing data by carrying out additional consultation with a) employees b) local communities
<b>Consultation</b>	<p>Engagement in the development of this strategy included running a series of workshops with an internal working group made up of more than 25 officers from across Children’s Services, circulating surveys via the school bulletins and attending headteacher meetings, meeting with voluntary and community sector organisations, attending parent and carer coffee mornings and reference groups, and asking children and young people targeted questions about their views and experiences via their allocated workers.</p> <p>The emerging themes from the engagement work are as follows:</p> <ul style="list-style-type: none"> <li>- The desire of both parents/carers and schools to work together more closely to manage behaviour issues as they arise. Learning from the school inclusion pilot in both boroughs and the findings from the select committee support the importance of these relationships.</li> <li>- Children and young people are increasingly experiencing overlapping vulnerabilities leading to the need for systemic interventions. The ARC trauma training that is being rolled out across the Bi-borough was frequently referenced as having a significantly positive impact on attitudes and approaches.</li> <li>- Accessibility of targeted support as some children and young people may require further support around specific needs or stages.</li> <li>- Offering a more diverse range of pathway options for young people was highlighted as key for improving their engagement with education. An academic curriculum doesn’t suit every child or young person’s skills, interests or aspirations. We found that in some cases there may be additional barriers to engagement such as parental consent, cultural barriers, eligibility thresholds or being educated out of borough</li> </ul>
<b>Analysis of consultation outcomes</b>	Feedback from the consultation stage offers tangible proposals for how to reduce permanent and fixed term exclusions across the bi-borough and in particular how to address the overrepresentation of certain groups and characteristics in the excluded population
<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p>This strategy aims to reduce inequality in educational settings across the Bi-borough. As highlighted above certain groups of children and young people within the protected characteristics of Age, Sex, Ethnicity and Disability, as well as those with certain socio-economic and geographical characteristics are disproportionately affected by exclusion processes. The strategy will positively impact these characteristics with key development areas identified. These are complimented by both short-term and long-term actions to support with the implementation of the principles:</p> <ul style="list-style-type: none"> <li>- Empowering parents/carers with the information, skills and opportunities to play this important role, with a particular focus on providing culturally sensitive support, and on ensuring policies and procedures are clearly communicated and available in a range of languages and accessible formats.</li> </ul>



	<ul style="list-style-type: none"> <li>- Having the systems and processes in place to provide assurances that every exclusion is legal and fair including by working with schools on reviewing their behaviour policies to ensure they are not discriminating against any protected characteristics (e.g. informed by an awareness of how trauma can manifest differently in the behaviour of boys and girls, and not pinpointing cultural mannerisms such as ‘kissing teeth’ for sanctions), and by strengthening LA oversight and management of all placements into AP</li> <li>- Recognising intersectional experiences that a child or young person may face and that schools are only one part of the network in place to support those who are vulnerable, i.e. raising schools’ awareness of what might be going on for a child outside of school (e.g. poverty, parental mental health, siblings known to YOTs etc.), ensuring decisions are informed by a complete picture of a child’s circumstances and linking in a network of professionals to provide wrap around support centred around the whole family.</li> <li>- Children and young people may need targeted support around specific needs or stages and this support must be readily available with barriers to engagement removed, particularly around transitions into secondary schools, those who were directly affected by the Grenfell fire in North Kensington, and those with SEN or mental health needs.</li> <li>- Children and young people should have the opportunity to thrive in education and training that aligns with their skills, interests and aspirations, meaning we need to ensure a range of mainstream and specialist pathways are available for young people including a stronger vocational offer.</li> <li>- Everyone has the right to be treated fairly and equitably where they live and learn</li> <li>- Children, young people and their families should have the option of being supported by professionals and organisations they trust. In line with this we will upskill community organisations who already have good relationships with families within the community. This will ensure they are equipped to support parents and carers to meet their responsibilities, to understand their legal rights and how to access specialist support.</li> <li>- We are collectively responsible for ensuring all children and young people have the opportunity to thrive in education</li> <li>- We have a duty to invest responsibly in provision that is known to be effective and this is meeting local needs</li> </ul>
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<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	No negative or adverse consequences have been noted to emerge from this strategy. We recognise that the strategy will have a positive impact on cohorts vulnerable to exclusion. However, we are missing data which evaluates the implications it will have on the relationship between religion/belief systems and exclusions, alongside sexual orientation. Further investigation will be undertaken to gather and evaluate available data on these subjects to add to the strategy.

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>						
	<b>Issue identified</b>	<b>Action (s) to be taken</b>	<b>When</b>	<b>Lead officer and borough</b>	<b>Expected outcome</b>	<b>Date added to business/service plan</b>
	Lack of data on religion/belief	Source available data / make	Data collection from the Summer	Laura Gregory	Improved understanding of	8/02/2021

	systems and school exclusions	arrangements for data collection and undertake analysis	term monitoring period onwards. Analysis to take place once adequate data is collected.		the relationship between religion/belief systems and the risk of school exclusion, and of the make up of the Bi-borough excluded cohort in terms of these characteristics.	
	Lack of data on sexual orientation and school exclusions	Source available data / make arrangements for data collection and undertake analysis	Data collection from the Summer term monitoring period onwards. Analysis to take place once adequate data is collected.	Laura Gregory	Improved understanding of the relationship between sexual orientation and the risk of school exclusion, and of the makeup of the Bi-borough excluded cohort in terms of these characteristics.	08/02/2021
	Lack of data on gender reassignment and school exclusions	Source available data / make arrangements for data collection and undertake analysis	Data collection from the Summer term monitoring period onwards. Analysis to take place once adequate data is collected.	Laura Gregory	Improved understanding of the relationship between gender reassignment and the risk of school exclusion, and of the makeup of the Bi-borough excluded cohort in terms of these characteristics.	08/02/2021

**Section 08**

**Director/ Head of Service sign-off**

Name: Ian Heggs  
Position: Director of Education

	Email: ian.heggs@rbkc.gov.uk Telephone No:
<b>Key Decision Report (if relevant)</b>	If the EqIA relates to a ' <b>Key Decision</b> ', sign off from the relevant lead Member is required.  <b>Name of Lead/ Cabinet Member:</b>  <b>Date of report to Lead/Cabinet Member: XX / XX / XX</b>  Key equalities issues have been included and the EqIA presented alongside the KDR: <b>Yes</b>
<b>Lead ED&amp;I Officer (where involved)</b>	Name: Angela Chaudry Position: Equalities and Diversity Officer Date advice / guidance given: December 2020 and January 2021 Email: angela.chaudry@rbkc.gov.uk Telephone No:
<b>Review Date/s Recommended at: 3 months; 6 months and 12 months</b>	1st Review: 1 <sup>st</sup> July 2021 2 <sup>nd</sup> Review: 1 <sup>st</sup> October 2021 3rd Review: January 2022