

## Appendix D

# Equality Analysis (EA)

### Section 1 – Primary School Place Planning

#### What is being analysed? (Aims and Objectives)

<b>Title</b>	<b>Primary School Place Planning</b>  <b>Amalgamation of St Stephen’s and St Mary Magdalene’s Church of England (CE) Primary Schools</b>
<b>What are you analysing?</b> <ul style="list-style-type: none"><li>• What is the policy/project/activity/strategy looking to achieve?</li><li>• Who is it intended to benefit? Are any specific groups targeted by this decision?</li><li>• What results are intended?</li></ul>	<ul style="list-style-type: none"><li>• The proposed amalgamation of St Stephen’s and St Mary Magdalene’s CE Primary schools. The joining together as a one form entry CE school will remove one form of entry from primary provision in Westminster from September 2023. The overall borough surplus capacity stands at 25.7%. The joining of schools will provide pupils with a full and enriched curriculum as the school will be fully subscribed and fully funded per pupil.</li><li>• Children of statutory primary school age (4-11) currently on roll of St Stephen’s and St Mary Magdalene’s CE Primary School and future children that will join the amalgamated school.</li><li>• Staff currently employed by St Stephen’s and St Mary Magdalene’s CE Primary Schools</li><li>• That Westminster Council agrees to determine the statutory notice proposal to amalgamate St Stephen’s and St Mary Magdalene’s CE Primary Schools. The amalgamation will result in the discontinuation of St Stephen’s CE Primary School on 31<sup>st</sup> August 2023. The new amalgamated St Stephen’s and St Mary Magdalene’s CE Primary School will accommodate all pupils on roll of both schools with effect from 1<sup>st</sup> September 2023 as a one form entry school on the St Mary Magdalene’s school site.</li></ul>

Name of the proposal including aims, objectives and purpose

*(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)*

## **What is being analysed? (Aims and Objectives)**

### **Amalgamation of St Stephen's and St Mary Magdalene's Church of England (CE) Primary Schools**

This Equalities Impact Assessment concerns the proposal of St Stephen's and St Mary Magdalene's CE Primary schools, whereby St Stephen's would discontinue and its pupils would transfer to St Mary Magdalene's CE, should their parents choose to take up a place there.

Westminster has a great tradition of excellent education; it values the important role that schools have in increasing the life chances of its children. However, the borough is now in a position where there is the need for longer term planning to maintain the success and future sustainability of its schools.

Demand for school places is driven by population growth and housing development. Falling birth rates, changing resident demographics and young families migrating out of the borough have resulted in a significant surplus of primary school places across most of the borough. Between 2012- 2021 there has been a 17% decrease in the birth rate in London, a reduction of 23,225 live births across the capital. As of October 2022, there is a 25.7% surplus in primary school places. This is significantly above the suggested 5 -10% surplus that urban local authorities are advised to operate with. The 5-10% surplus is designed to allow local authorities to meet their statutory duty to provide sufficient school places, yet still enable parents to have some choice of schools.

The impact of falling rolls across the borough, reductions in education funding and schools in financial deficit present several challenges. It has therefore been necessary to consider making changes that will ensure we have the right provision in the right place at the right time going forward. Provision that can be well resourced and is of high quality will enable schools to continue to thrive and offer the opportunities that children deserve: a strong curriculum with excellent teaching, enriching activities and a joyful experience at primary school.

A primary school review was initiated in the Summer of 2020 which was led by Isos Partnership.

The aim and objectives of the review were to look at all the options to address the surplus of places and the financial viability of schools. Key stakeholders of the review included heads, governors, Diocese representatives and senior council officers. The key recommendations from the review were to (1) reduce surplus capacity, (2) support schools' financial management, and (3) maximise pupil numbers. The review identified schools considered to be at risk due to low pupil numbers and/or a budget deficit.

St Stephen's CE Primary School is identified as a school at risk owing to falling rolls over the last four years, meaning lower numbers have joined the school. Taking account of pupil projections that are forecast to decline further over the next five years, this deficit will increase as pupil numbers decline.

St Stephen's deficit was £256,000 at the end of March 2023 and is estimated to be about £400,000 on 31st August 2023, the date of proposed discontinuation (as part of the amalgamation).

The work at St Stephen's and St Mary Magdalene's is in partnership with the Church of England Diocese and being planned and supported through the LA's work with Westminster Education Partnership Board (EPB), which plays a key role in enabling schools to meet the challenge of ensuring that all children and young people in Westminster achieve the best possible outcomes and can flourish if schools are working in effective partnerships.

### **Conclusion - To be completed at the end of the Equality Analysis process**

*(The exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken.)*

Based on the findings of the EA, the proposal is robust. The proposal ensures increased equality of opportunity in regard to improved educational outcomes for all St Stephen’s and St Mary Magdalene’s pupils. This should ensure that these pupils will leave primary education with a robust education and having had the opportunity to participate in enriching extra-curricular activities.

No pupil with any protected characteristic will be denied access to high quality provision as a result of these proposals. The proposals ultimately support the sustainability of the wider school system. A positive impact that the proposed changes will have on future service users and staff across Westminster primary schools is that they will be enrolled/employed by a more sustainable school system leading to the potential for greater opportunities for increased diversity, flexibility and availability of resources. Additionally, the reduction of surplus places within the wider school system should enable resources, which is currently being directed to manage falling school rolls, to be re-directed to increasing schools’ per pupil allocation.

The St Stephen’s school site will be retained for educational use to be determined following a feasibility study of the most suitable provision.

<p>Details of the lead person completing the screening/EIA</p>	<p>(i) Full Name: <b>Wendy Anthony</b></p> <p>(ii) Position: <b>Head of School place Planning and Access to Education</b></p> <p>(iii) Unit: <b>Education</b></p> <p>(iv) Contact Details: <a href="mailto:wendy.anthony@rbkc.gov.uk">wendy.anthony@rbkc.gov.uk</a> Tel:07791743413</p>
<p>Date sent to <a href="mailto:Equalities@westminster.gov.uk">Equalities@westminster.gov.uk</a></p>	<p>16/05/2023</p>
<p>Version number and date of update</p>	<p>Version2 -May 2023</p>

## Section 2 – Evidence (Consideration of Data and Information)

An overview of who uses/will use the service/facility and identify who are likely to be impacted by the proposal. The following evidence has been considered:

### Engagement evidence

The schools' governing bodies have undertaken an initial, informal consultation between Monday 16<sup>th</sup> January 2023 and Friday 10<sup>th</sup> February 2023 with their parents, staff and communities. Both governing bodies agreed to consult and shared this information with parents and staff, as well as circulating a letter about the review to all parents. A document was circulated via email, paper versions and placed on the schools' websites. Parent sessions were held at both schools. Frequently asked questions that arose from each meeting were documented with responses and placed on each school's website and made available in hard copy at parents meetings.

St Mary Magdalene's received 16 responses to the proposal (six parents, seven staff, one governor and two unidentified). None were against the amalgamation and all 16 were in favour of the proposal. St Stephen's received 18 responses to the proposal (eight parents, two staff, four governors, one volunteer and three unidentified). None were against the amalgamation; all 18 were in favour.

The following meetings were held during the governor led consultation:

**St Stephen's** - meetings were held on Monday 23<sup>rd</sup> January 2023 at 4.30pm and Tuesday 31<sup>st</sup> January 2023 at 9am

**St Mary Magdalene's** - meetings were held on Tuesday 24<sup>th</sup> January 2023 at 5.00pm and Monday 30<sup>th</sup> January 2023 at 9am

The governing bodies of both schools met separately on 27<sup>th</sup> February 2023, they discussed and considered in detail the consultation feedback and notified the Council on 28<sup>th</sup> February 2023 of their recommendation to proceed with the proposal to amalgamate. In accordance with statutory guidance Opening and closing maintained schools, the Council is the decision-maker and responsible for issuing a statutory notice about the proposal for a four-week period during which further representations can be made. The statutory notice was published on 28<sup>th</sup> March 2023 to run for a six-week period to end on 5<sup>th</sup> May 2023 (extended from the required 4 weeks to 6 weeks to take account of the Easter holiday). In total, the Council received 29 responses during the notice period. Respondents identified themselves as parents and staff from both schools and governors. 27 agreed with the amalgamation proposal and 2 indicated they did not agree.

### Other Evidence

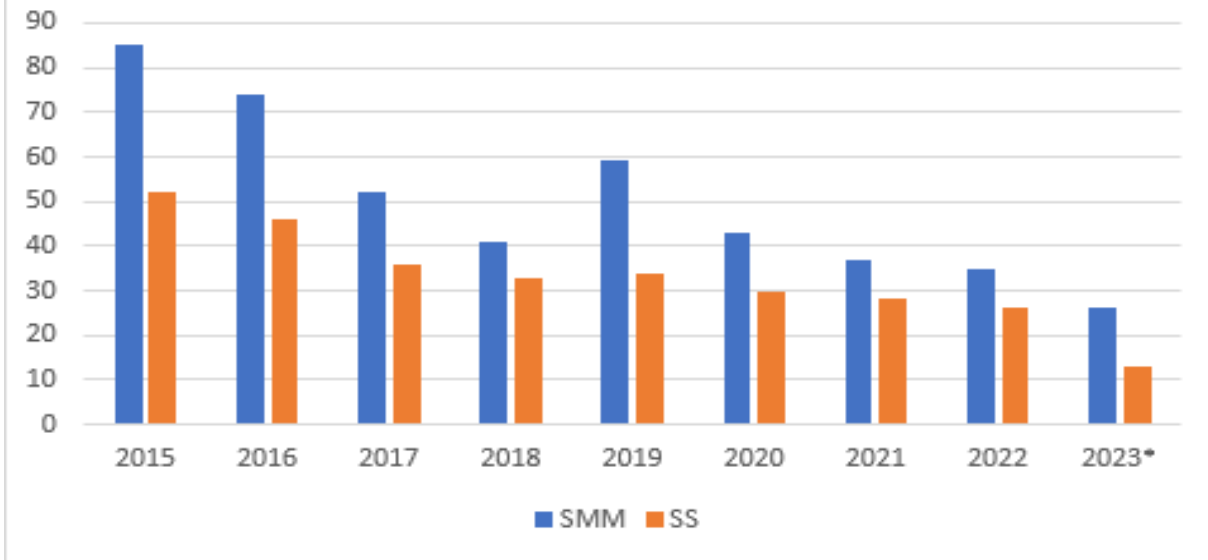
#### Reception applications

Both schools have been experiencing a gradual decline in applications since 2017 that have been more significant in the last 3 years.

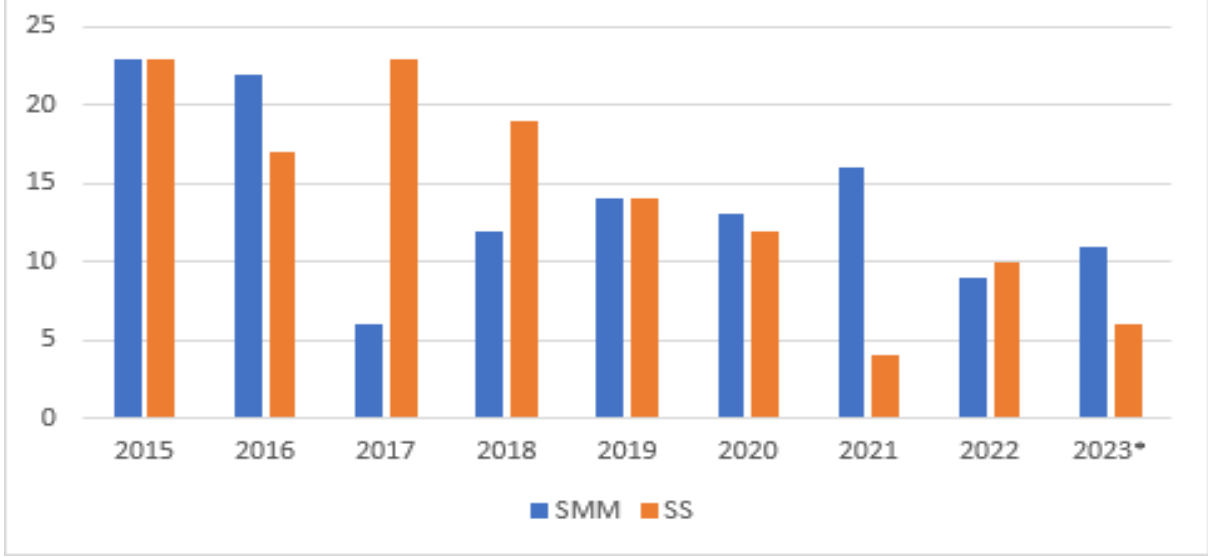
Total applications			
Year	SM M	SS	Total
2017	52	36	88
2018	41	33	74
2019	59	34	93
2020	43	30	73
2021	37	28	65
2022	35	26	61
2023	26	13	39

First Preferences			
Year	SMM	SS	Total
2017	6	23	29
2018	12	19	31
2019	14	14	28
2020	13	12	25
2021	16	4	20
2022	9	10	19
2023	11	6	17

### Total Applications



### First Preferences



#### Pupil projections

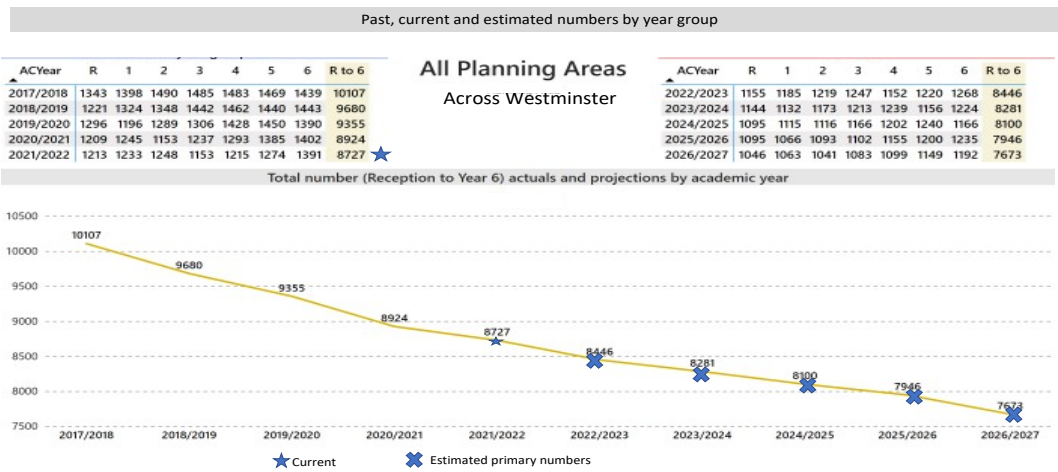
School Roll projections are carried out annually as local authorities have a statutory responsibility to ensure there is not only a sufficiency of school places, but that there are strategies in place to address excess surplus, particularly if forecast indicates that demand is not projected to rise. Westminster uses the GLA modelling for its forecasting.

Whilst LAs are not under a duty to reduce school places if pupil numbers fall, DfE statutory guidance states, 'The department expects LAs to manage the school estate efficiently and to reduce or find alternative uses for surplus capacity'.

The first table on the next page shows the forecasts for the whole of Westminster. The second table shows the forecasts for the Bayswater planning area where both schools are located.

There are six Planning Areas (PA) for primary place planning purposes. The below table shows the forecasts for the combined PAs Total number of primary places provided across Westminster, excluding nurseries (based on the Published Admissions Number for each school (PAN):1396

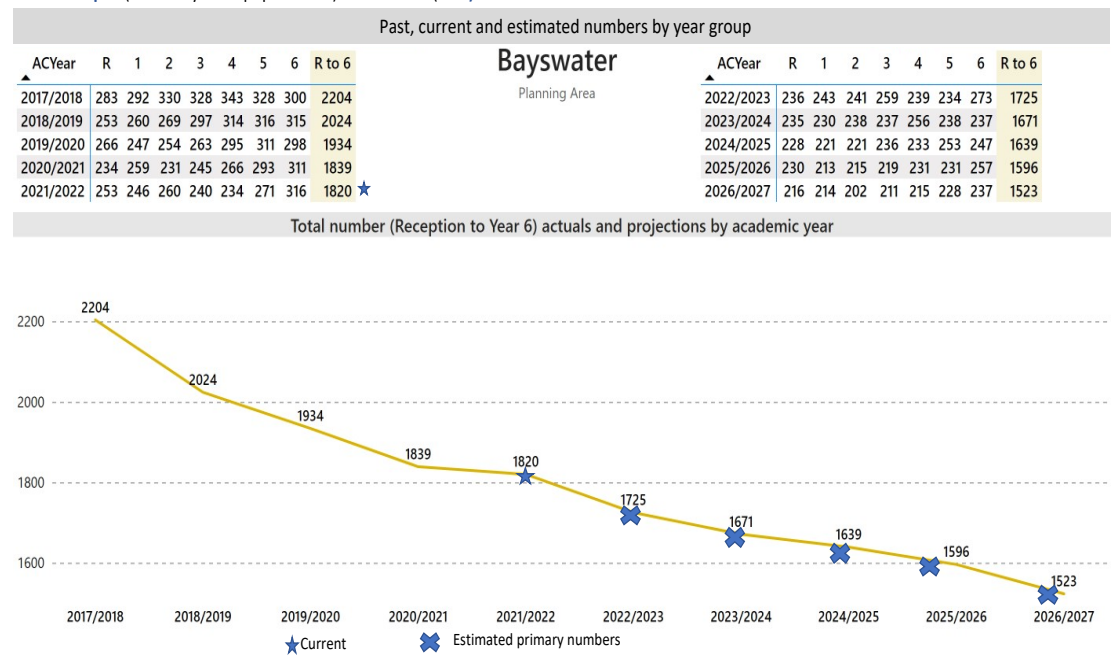
Current Surplus (as at May 2022 pupil census): 2699 (23.4%)



Planning Area 4: Bayswater- Ark Atwood, Edward Wilson, Hallfield, Our Lady of Dolours, St James and St John, St Mary Magdalene, St Mary of the Angels, St Stephen's

Total admissions number (based on the formal Published Admissions Number for each school (PAN): 2331

Current Surplus (as at May 2022 pupil census): 511 (21%)



### School census data of St Stephen's and St Mary Magdalene (October 2022)

Year group	St Stephen's	St Mary Magdalene	Totals
Reception	9	19	22
Year 1	3	23	26
Year 2	9	16	25
Year 3	9	19	28
Year 4	13	18	31
Year 5	17	17	34
Year 6	16	21	37
<b>Total</b>	<b>76</b>	<b>133</b>	<b>209</b>
<b>Spare capacity</b>	<b>64%</b>	<b>36.6%</b>	

\*based on October census 2022



### Section 3 – Assessing the Impacts on the Equality Groups

In order to be able to identify ways to mitigate any potential impact, it is essential that we know what those potential impacts might be. Using the evidence gathered in Section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

Equality Groups	Impact			Reason(s)
	Positive	Neutral	Negative	
<p><b>Protected characteristics</b></p>				
Age	X			<p>Existing pupils aged 4 -11 on roll at both schools have a guaranteed place at the amalgamated St Mary Magdalene’s and St Stephen’s CE Primary School.</p> <p>Children aged 4-11 have the choice to access ‘Good’ quality sustainable education at other schools in the surrounding area if they choose, where vacancies exist and by preference in accordance with admission criteria.</p> <p>An opportunity to increase the utilisation of the St Stephen’s Primary School site with aligned services supporting the local community may have a positive benefit for this protected group.</p> <p>Both schools currently offer nursery provision for children aged 3 upwards, thereby access to a nursery place remains a provision offered to families from both schools.</p> <p>As a school’s financial position is based on the number of children on roll, operating at capacity is imperative to ensure there is the budget to offer a rich curriculum as well as extra-curricular activities. Owing to a sizeable budget deficit, the extracurricular offer at St Stephen’s has been reduced. As an amalgamated school with a healthy budget, pupils will benefit from extracurricular activities, and an</p>



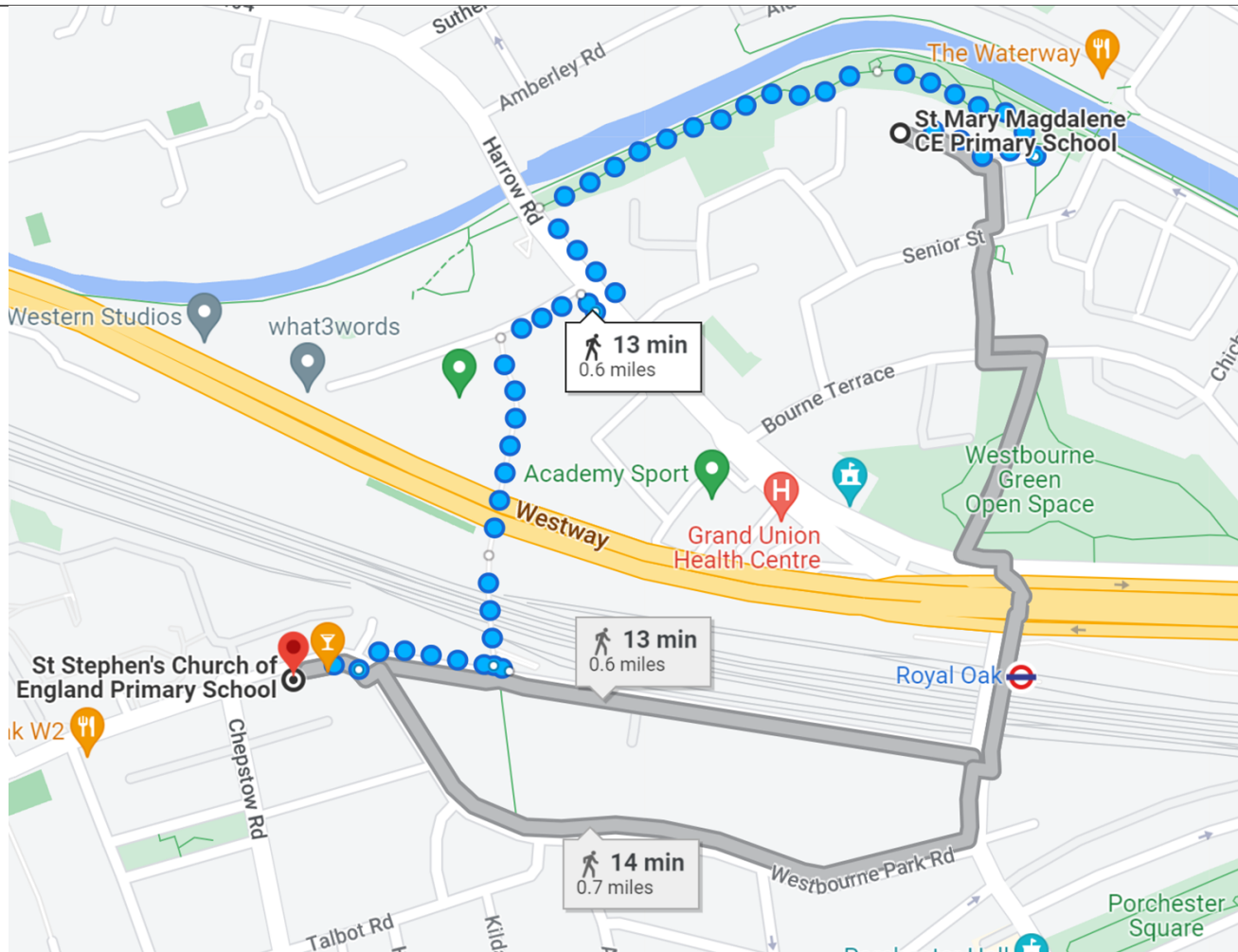
			extended school day is also beneficial for working parents.
Disability	X		<p>There are 21 pupils on roll at St Mary Magdalene's CE School who have been identified as having special educational needs, of whom there are 6 pupils with an Education Health and Care Plan. One pupil with an EHCP will be leaving the school at the end of July 2023 as they are in Year Six. There are 7 pupils on roll at St Stephen's who have been identified as having special educational needs, none of whom are in receipt of an Education Health and Care Plan.</p> <p>St Mary Magdalene's currently has step free, accessible access to its Early Years and KS1 areas as well as the communal areas. They have a hearing loop to support pupils with a hearing impairment. There is no lift within the main building. However, if there is a need for adjustments or adaptations to meet needs of current or future pupils or staff, the Diocese would be expected to complete a feasibility study to assess appropriate capital works.</p>
Sex		X	<p>Currently at St Stephens', the gender breakdown is 42 boys and 34 girls, at St Mary Magdalene's - 74 boys and 59 girls. Joining the two schools will ensure there is a more equal gender breakdown. All pupils, irrespective of gender, will also benefit from the improved educational outcomes that should be achieved through joining the two schools.</p> <p>The staff gender breakdown is weighted heavily towards women at both schools, meaning there will be more of an adverse impact on females if there are due to be redundancies with the new staffing structure. However, this is purely because more women than men are employed, as is the case in most primary school provision in this Borough and elsewhere.</p>
Gender Reassignment	X		No impact identified.
Marriage or civil Partnership	X		No impact identified.
Religion or belief	X		<p>Without non-Church of England children at CofE schools, a number of faith schools in Westminster would not be financially viable. However, the current plan for amalgamation enables St Stephen's and St Mary Magdalene's children to have an option to continue in CofE provision, although parents are able to opt for a non-denominational school should they prefer.</p> <p>Joining the schools will not cause any significant changes to the pupil demographic of the new school</p>

Race	X	with both schools having a multicultural intake. Both schools have pupils with English as an additional language so will be able to share best practice with how to support children who are bi/multi-lingual. Both schools have a high proportion of over 20% with Arabic as their first language. All pupils, irrespective of ethnicity, will also benefit from the improved educational outcomes that should be achieved through joining the two schools.			
		Ethnicity	St Mary Magdalene CofE Primary School	St Stephen's CofE Primary School	Combined
		Afghan	10.7%	5.0%	8.3%
		Albanian	3.0%	0.0%	1.7%
		Any other Asian background	0.6%	1.7%	1.0%
		Any other Black background	3.6%	2.5%	3.1%
		Any other mixed background	13.6%	1.7%	8.7%
		Any other white background	0.0%	1.7%	0.7%
		Arab other	3.6%	5.0%	4.2%
		Bangladeshi	0.6%	24.2%	10.4%
		Black Caribbean	3.6%	2.5%	3.1%
		Black Congolese	0.0%	4.2%	1.7%
		Black Ghanaian	1.2%	0.0%	0.7%
		Black Nigerian	1.2%	1.7%	1.4%
		Black Sierra Leonean	0.0%	0.8%	0.3%
		Black Somali	0.6%	0.8%	0.7%
		Black Sudanese	1.8%	5.8%	3.5%
		Chinese	0.6%	0.0%	0.3%
		Egyptian	1.8%	0.8%	1.4%
		Indian	3.0%	0.0%	1.7%
Information not yet obtained	0.0%	1.7%	0.7%		
Iranian	5.3%	0.8%	3.5%		
Iraqi	4.1%	2.5%	3.5%		
Kosovan	2.4%	0.8%	1.7%		
Kurdish	0.6%	10.0%	4.5%		
Lebanese	12.4%	5.0%	9.3%		
Moroccan	5.9%	3.3%	4.8%		
Other Asian	0.0%	0.8%	0.3%		
Other Black African	0.6%	0.8%	0.7%		

Other ethnic group	2.4%	1.7%	2.1%
Pakistani	0.0%	0.8%	0.3%
Portuguese	1.8%	0.0%	1.0%
Refused	1.2%	0.8%	1.0%
White and Asian	0.0%	1.7%	0.7%
White and Black African	0.6%	0.8%	0.7%
White and Black Caribbean	4.1%	3.3%	3.8%
White British	4.7%	2.5%	3.8%
White European	0.0%	0.8%	0.3%
White Irish	0.6%	0.0%	0.3%
White other	1.8%	2.5%	2.1%
White Western European	1.2%	0.0%	0.7%
Yemeni	1.2%	0.8%	1.0%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Language	St Mary Magdalene CofE Primary School	St Stephen's CofE Primary School	Combined
Albanian/Shqip	4.1%	1.7%	3.1%
Amharic	0.0%	1.7%	0.7%
Arabic	27.2%	20.8%	24.6%
Arabic (Morocco)	0.6%	0.8%	0.7%
Arabic (Sudan)	0.0%	0.8%	0.3%
Bengali	1.8%	17.5%	8.3%
Chinese (Mandarin/Putonghua)	0.6%	0.0%	0.3%
Classification pending	0.0%	0.8%	0.3%
Dari Persian	3.6%	4.2%	3.8%
Dutch/Flemish	0.0%	0.8%	0.3%
English	39.6%	29.2%	35.3%
French	1.8%	0.8%	1.4%
Information not obtained	0.0%	2.5%	1.0%
Italian	2.4%	0.0%	1.4%
Japanese	1.2%	0.0%	0.7%
Kurdish	0.6%	10.0%	4.5%

				Lingala	0.0%	0.8%	0.3%
				Pashto/Pakhto	7.1%	2.5%	5.2%
				Persian/(any)	1.2%	0.8%	1.0%
				Persian/Farsi	1.2%	0.8%	1.0%
				Portuguese	3.0%	0.8%	2.1%
				Portuguese (Brazil)	1.8%	0.0%	1.0%
				Somali	0.6%	0.8%	0.7%
				Swahili (any other)	0.6%	0.0%	0.3%
				Tagalog/Filipino	0.0%	0.8%	0.3%
				Turkish	0.0%	0.8%	0.3%
				Yoruba	1.2%	0.0%	0.7%
				<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Sexual orientation	X			No impact identified. No data on sexual orientation collected			
Pregnancy or maternity	X			Staff employed at both schools that are either on, or due to go on maternity leave, continue to have the same employment rights as all employed staff. As part of the consultation process, Governors will work with the, staff and their unions, and an HR consultant to determine the best ways to manage any changes needed. The Council, Diocese and Governors are committed to avoiding compulsory redundancy.			
<b>Other</b>				The decision about a new uniform is being undertaken by the governing bodies, with financial support offered by the LA.			
Travel		X		In terms of walking distance school to school there are two main routes through the underpass but multiple options coming in at 0.6 miles and an average 13 minute walk.			



S

Socio-economic

X

Depending on the home location, some children may have the above additional travel time to school but it is not considered to be an unreasonable additional distance. Public transport is accessible from all directions and remains free for children under 11. Families are encouraged to walk or cycle or use public transport and avoid traveling by car to school.

The socio-economic background of the pupils is similar with 51.1% of pupils on roll of St Mary 51.1% of pupils eligible for Free School Meals, and 64.5% at St Stephen's. The borough average is 36.6%.

				Both schools have nursery provision and will continue to provide part-time provision for children from three years old with some full-time places .
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**Section 4 - Action Plan**

**4.1** Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.

*Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.*

**NB. Add any additional rows, if required.**

Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
<b>No negative impacts identified</b>						
<i>Enter additional rows if required</i>						

**THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER**



**SIGNATURE:**

**FULL NAME:** Wendy Anthony

**UNIT:** Education services ....

**EMAIL & TELEPHONE EXT:** [wendy.anthony@rbkc.gov.uk](mailto:wendy.anthony@rbkc.gov.uk) Tel: 07791743413

**DATE** 016/05/2023

**WHAT NEXT?**

**It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.**

**All EIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).**

**All completed EIAs should be sent to [Equalities@westminster.gov.uk](mailto:Equalities@westminster.gov.uk)**