

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

<b>Directorate:</b> Children's Services	<b>Service area:</b> Learning, skills and universal services
<b>Lead person:</b> Paul Brennan, Viv Buckland, Barbara Newton	<b>Contact number:</b> 07891 27105 Natalie Samuel (supporting officer)
<b>Date of the equality, diversity, cohesion and integration impact assessment:</b> 04/01/16 – 25/02/16	

**1. Title:** Improving the offer of specialist education provision in Leeds for children and young people with complex social, emotional and mental health needs and associated behavioural issues: ceasing to provide SEMH provision under the governance of the West Oaks Specialist School and College, Oakwood Lane site and offering the provision instead under the governance of a new 'through school' academy provider, the Wellspring Academy Trust, from 1<sup>st</sup> September 2016

Is this a:

**Strategy / Policy**
 **Service / Function**
 **Other**

**2. Members of the assessment team:** NB SEMH academy project group members directing the EDCl:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Paul Brennan	Learning, skills and universal services (LSUS)	Deputy Director
Andrew Eastwood	LSUS	Learning improvement lead
Vivienne Buckland	LSUS	Head of service
Nigel Wilson	LSUS	Service manager - bringing expertise on statutory process
Chris Gosling	LSUS	Service officer – bringing expertise on built environments

Barbara Newton	Complex needs service	Head of service – bringing specialist expertise on complex SEMH needs
Val Waite	Complex needs service	Service manager – bringing specialist expertise on complex SEMH needs
Victoria Coyle	Complex needs service	Service manager – bringing specialist expertise on complex SEMH needs
Gail Faulkner	Children’s social care	Head of service – bringing specialist expertise on social care needs
Jim Hopkinson	Targeted services	Head of service – bringing expertise on targeted services
Arnet Donkin	Interim head teacher BESD SILC, PRU lead	Head teacher – bringing views of staff and service users
Various colleagues	The Wellspring Academy Trust	Managers of service

**3. Summary of strategy, policy, service or function that was assessed:**

Leeds City Council is re-designing our local offer of specialist education provision for children and young people with complex social, emotional and mental health needs (SEMH needs; formerly known as ‘behavioural, emotional and social difficulties’, or ‘BESD’).

This group of children has a highly complex and specific form of Special Educational Need and typically have much poorer outcomes than their peers. We aim to radically improve outcomes for this group and move much closer to equality in outcomes and improved experiences for this often vulnerable and stigmatised group.

As part of our planned developments, we are undertaking consultation on a proposal to cease to provide SEMH provision for complex needs at the Oakwood Lane site under the governance of the West Oaks Specialist School and College, and to offer the provision instead on the same site, but under the governance of a new ‘through school’ academy provider, the Wellspring Academy Trust, from 1<sup>st</sup> September 2016.

This EDCI impact assessment focuses on the specific proposal for changes to the provision at the Oakwood Lane site currently led by West Oaks Specialist School and College (referred to as ‘Oakwood Lane for brevity’ from herein). It will include results of a statutory process of consultation with all those potentially affected.

**Context for the proposed change: developments to the whole offer of education provision for complex SEMH needs in Leeds:**

Leeds City Council aims to radically improve the quality, range and flexibility of our current provision for children and young people with complex social, emotional and mental health (SEMH) needs, developing world-class education in Leeds for this vulnerable group of learners and providing more places to support our growing population.

To date we have offered 5 provisions to meet SEMH needs in Leeds. They all have separate leadership and each of them is a ‘city wide’ provision for a different age group. This means pupils have to travel across the city to access that one provision for their age group. The lack of shared leadership also means there can be inconsistencies in approach

and transition from one site to another is not as quick and efficient as it could be.

The current provisions are:

- Specialist provision at the Oakwood Lane site of the West Oaks SEN Specialist School and College for pupils aged 4-11 with the most complex SEMH needs. These pupils will have an Education, Health and Care plan (EHC plan) or statement.
- Specialist provision at the Elmete School (also known as the BESD SILC) providing longer term intensive support for pupils aged 11-16 with the most complex SEMH needs. These pupils will have an EHC plan or statement. The current building is not of a high standard and is old. The school is also currently not achieving a good standard of education and needs rapid improvement. There is only this one site in the city to meet the needs of learners aged 11-16 with these needs, so some learners must travel a long way each day.
- 3 Pupil Referral Units (PRUs), each providing short term intensive support and assessment places for pupils who need time away from their mainstream school and an assessment of their needs. Each caters for one specific key stage (age group): the Oakwood Centre for key stage 2, the Burley Park Centre for key stage 3 and the Tinshill Centre for key stage 4. The buildings at Tinshill and Burley Park are not of a high standard and are old. There is only this one site for each age range in the city, so some learners must travel a long way each day

Our vision for the future is of one single multi-site through-school provision for 4-19 year olds, led by the Wellspring Academy Trust, an academy trust with a very strong record of supporting SEMH needs in other areas of the country.

This would provide a more 'joined- up' approach and smoother, quicker transitions from one site to another. It would also allow more flexibility on when learners move into secondary aged provision, as learners could move from 10 years of age under the proposed model.

It would also offer around 100 places more overall than are currently available.

It would consist of these sites, subject to planning permission, and the results of consultation in terms of the site at Oakwood Lane:

- A site offering places approx. 40 places for learners aged 4-11 with complex SEMH needs and an EHC plan or statement of SEN, at the current Oakwood Lane site led by the West Oaks SEN Specialist School and College. At the same site and in separate building (the current Oakwood PRU), approx. 24 short-term assessment places would also be available. Numbers of each type of place will be flexible depending on changing needs of the city. Whether this provision is integrated into the single 'joined-up' through-school provision, depends on the results of this

consultation.

- A new building in South Leeds for learners aged 10-19 with complex SEMH needs and EHC plan or statement of SEN. On the same site, short term assessment places will also be available. A total of approx. 100 places will be available. Numbers of each type of place will be flexible depending on changing needs of the city.
- A site in East Leeds for learners aged 10-19 with complex SEMH needs and EHC plan or statement of SEN. On the same site, short term assessment places will also be available. A total of approx. 100 places will be available. Numbers of each type of place will be flexible depending on changing needs of the city.
- A site in North Leeds for learners aged 10-19 with complex SEMH needs and EHC plan or statement of SEN. On the same site, short term assessment places will also be available. A total of approx. 100 places will be available. Numbers of each type of place will be flexible depending on changing needs of the city.

By providing 3 sites across the city for those of secondary age, we will be able to place learners closer to the area in which they live and avoid lengthy travel for those currently accessing out of area provision due to inadequacies in our current offer of provision.

The new buildings will improve the quality of accommodation and extend the range of facilities available. Design work will be tailored to suit SEMH needs and will be flexible in terms of how the space can be used to meet different needs.

Rigorous consultation and impact assessment was undertaken in 2012 and proposals approved by the Executive Board on the merging of our current PRU provision and the BESD SILC provision, as described above (please see appendix 4 for detail).

However at that point, the more recent plans to incorporate the specialist primary provision at Oakwood Lane into the new provision were not consulted on, and the impact for stakeholders specifically linked with the site was not assessed. This further development has been prompted, with the support of governors at the West Oaks SEN Specialist School and College, by the desire to create one unified, high quality 'through school' provision for the full age range from 4-19 and ensure younger learners can access the same improvements to provision that secondary aged learners will experience through the planned developments.

If the consultation process and subsequent decision-making finds we should proceed, the provision at Oakwood Lane currently run by the West Oaks SEN Specialist School and College will become part of the integrated academy alongside all other SEMH provision, under the leadership of the new academy. This will improve consistency across all sites and will also allow more flexibility for learners move into a secondary provision as is most timely to meet their needs.

This EDCI impact assessment assesses the impact of those changes.

**4. Scope of the equality, diversity, cohesion and integration impact assessment**  
(complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing

a service, function or event)

<b>4a. Strategy, policy or plan</b> (please tick the appropriate box below)	
n/a	
The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>

<b>4b. Service, function, event</b> please tick the appropriate box below	
The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input checked="" type="checkbox"/>
Procuring of a service (by contract or grant)	<input type="checkbox"/>
<b>Please provide detail:</b>	
This assessment is specific to education provision in Leeds for children aged 4-11 with highly complex social, emotional and mental health (SEMH) needs.	

<b>5. Fact finding – what do we already know</b> Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback. (priority should be given to equality, diversity, cohesion and integration related information)
A significant amount of research and consultation has been done in the preparation stages of this work.  Some of the following papers and reports do not specifically reference the proposed changes at Oakwood Lane but do supply valuable context. They also provide relevant details of the views of parents and carers and children and young people in terms of their priorities for SEMH provision generally.  <ul style="list-style-type: none"><li>• Appendix 1: research into the needs of learners with complex SEMH needs and the</li></ul>

characteristics of provision required to best meet those needs, undertaken by the complex needs service educational psychology team, 2014

- Appendix 2: Considerations on the range of provision required to meet differing SEMH needs, undertaken by the complex needs service educational psychology team in 2014
- Appendix 3: Literature review regarding aspects of provision for differing SEMH needs, undertaken by the complex needs service educational psychology team in 2014
- Appendix 4: Report to Executive Board, February 2013: permission to consult on BESD school expansions (referring to previous consultation undertaken on the wider proposals on the merging of the PRU and BESD SILC provision in Leeds; please see 'context' above).
- Appendix 5: Data review, SEMH needs in Leeds, produced by the complex needs service best practice team in 2014.
- Appendix 6: Report on the views of children and young people on general SEMH provision, produced by the complex needs service best practice team in 2014.
- Appendix 7: Report on the views of parents and carers on general SEMH provision, produced by the complex needs service best practice team in 2014.
- Appendix 8: results of consultation with children and young people at the West Oaks provision at Oakwood Lane, produced by the complex needs service best practice team in January 2016.
- Appendix 9 SEN Improvement Test analysing if the proposals would benefit children with SEN and disabilities – this is a statutory requirement for any proposals to significant changes to schools
- (Report to which this assessment is attached): report to Executive Board, March 2016: results of consultation with all stakeholders regarding proposed changes to the specialist primary provision at Oakwood Lane and request to publish statutory notice

**Are there any gaps in equality and diversity information:**

**Please provide detail:**

During the scoping phase of this EDCI assessment, it was identified that results of statutory consultation on the proposal were required to ensure representation of the specific views of parents/carers and children at the site, and of staff working at the site; and of interested parties in the local community and general public.

**Action required:**

A series of meetings was subsequently arranged within a statutory process of consultation, including:

- 2 public meetings open to any interested members of the public and promoted to families using the school and members of the local community. One was scheduled within school hours, and another later in the afternoon/evening, to suit the needs of parents/cares regardless of work schedules.
- A meeting with governors at the school
- A meeting with children at the Oakwood Lane specialist provision's school council
- A meeting with staff at the school

The public meetings were also widely publicised to other stakeholders – see item 6 below.

Results are provided in the appendices and are referred to in the following pages.

#### **6. Wider involvement – have you involved groups of people who are most likely to be affected or interested**

Yes

No

**Please provide detail:**

Consultation documents were posted on the public Leeds City Council website in the 'schools' section. Any member of the public with an interest can read the documents and use the 'response form' provided to share their views.

The formal consultation document was re-written in an accessible 'easy read' leaflet version. It was also accompanied by a leaflet with accessible information about the Wellspring Academy Trust.

A link to the documents with an email encouraging participation in the consultation was sent to:

- All elected members for sharing with communities and contacts as wished
- All head teachers
- SENCOs (special educational needs coordinators) in all Leeds schools and 0-19 settings
- Heads of service across children's services in the local authority, with a request to cascade the email to their teams
- Communications links within partner organisations, including health services and third sector organisations
- Parents' and carers' groups with an interest in special educational needs, with a suggestion that they might share this with their contacts. One group, EPIC Leeds, committed to sending the email onto the members (around 600 in total)
- Our group of 'voice, influence and change leads' working directly with children and young people and their families in Leeds who have committed to sharing relevant communications
- A mailing list held by the complex needs service of parents and carers who have requested information be sent to them about any consultations relevant to special educational needs.

**Action required:**

Communications lead Dave Glanville to provide a communication strategy to ensure

ongoing wider stakeholder information and engagement, subsequent to the final decision of the Executive Board on the proposed changes.

A communication sub-group has been formed to support this work and regular meetings have been planned.

### 7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

#### Equality characteristics

Age

Carers

Disability

Gender reassignment

Race

Religion  
or Belief

Sex (male or female)

Sexual orientation

Other

(Other can include – marriage and civil partnership, pregnancy and maternity, and areas that impact on or relate to equality: tackling poverty and improving health and well-being)

**Please specify:** Tackling poverty and improving health and well-being

#### Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

#### Potential barriers.

Built environment

Location of premises and services

Information  
and communication

Customer care

Timing

Stereotypes and assumptions





**Cost**



**Consultation and involvement**



**Financial exclusion**



**Employment and training**



**specific barriers to the strategy, policy, services or function**

## **8. Positive and negative impact**

### **8a. Positive impact:**

#### **Built environment:**

The proposed changes at the Oakwood Lane provision do not include a change of location, or any significant changes to the building and facilities. However including the provision in the new improved through-school provision led by the Wellspring Academy Trust would allow learners at the Oakwood Lane site access to all the buildings and facilities at the other new and improved sites within the whole provision. These sites will be purpose-built for SEMH needs and provide state-of the art facilities. This access will improve the experience of the learners significantly. As evidenced in appendix 8, children taking part in consultation on the proposed developments indicated all showed great enthusiasm for increased access to a wider range of facilities, especially more outdoor play and sport opportunities and greater access to ICT facilities.

The proposed changes would also enable increased flexibility for how the Wellspring Academy Trust manage the sites and the neighbouring Oakwood Lane PRU site, potentially allowing them to identify opportunities to improve the provision which have not been possible to date.

The current environment forms part of a school rated by Ofsted as 'outstanding' to date, hence no major changes are planned. The school is accessible and is designed to meet the needs of this group of learners. However it should be noted that in consultation with staff, some noted a desire for further facilities at the West Oaks site and felt that equity in quality of the sites across the whole of the proposed through school was imperative. This should be noted.

#### **Information and communication:**

The proposed changes at the Oakwood Lane provision would increase consistency of communication across SEMH provisions. Communication is currently undermined by having multiple different governing bodies and staff teams in place across the different provisions, including the Oakwood Lane provision. The proposed approach of a single unified leadership would greatly improve communication and consistency.

This in turn would support more effective processes for transition of learners as they move from the Oakwood Lane site, into the other sites offering secondary-aged provision. Transition can be a very difficult time for learners with SEMH needs, and effective transition practice is vital to support good outcomes and attendance afterwards.

The Wellspring Academy Trust is noted for good practice including communications with the parents and carers and children and young people who use their settings. Building quality relationships is an integrate part of the Wellspring philosophy and one of the prime tenets of their provision. This approach is affirmed by the research on good practice in this area, as evidenced in Appendix 3, which note that the quality of relationships in a troubled child or young person's life is the single most important factor in their improved outcomes. It is also affirmed by the views of parents and cares shared in Appendix shared in Appendix 7, who note the importance of having their views listened to, heard and respected; in Appendix 6, where children and young people also emphasise the importance of being listened to and feeling respected by staff. This vulnerable minority group of children and young people often suffer from stigma which affects their social relationships. Improving their self-esteem and their social interaction and communication is critical to their development. The Wellspring Academy Trust is in a very strong position to support this if our proposals do go ahead.

It will be important to ensure that any communications about the developments are made accessible to both children and young people and families and are in plain English and limited quantities of text given there may be varied levels of literacy.

**Cost:**

Financial savings will be a significant benefit if the proposed changes at the Oakwood Lane provision are approved and implemented. Currently, the range of support offered in the provision is not sufficient to support the needs of all children in Leeds with varied and highly complex needs. As a result, a significant number of children must access provision outside of Leeds. This situation results in great expense for the LA, both in terms of purchasing the specialist school places on other areas, and in terms of transport costs.

It also has a very negative impact on cohesion, in terms of dislocating children from their local community; and is inequitable, in as much as most children in Leeds – including those with other types of complex special educational need – can access education in their local area.

The new academy would be able to extend the range of support offered and would have flexibility in deploying the expertise of the newly integrated staff team across all the new sites. This should reduce the number of children whose needs cannot be met through our local offer of provision and must be sent outside of Leeds for their education. This in turn will reduce costs significantly.

This will not immediately impact on the children and young people and parents and carers in the school. However the savings will ensure the sustainability of other services funded from the same funding stream which many of these children and young people will also benefit – for example, Funding for Inclusion (FFI), which the vast majority of these children and young people access at present but which is endangered by current pressures on the funding stream which funds both specialist education settings and FFI.

Moreover, while this project represents long term cost savings, the initial developments across the whole planned developments to SEMH provision represent a major investment – the Council has committed £52 million to the project as a whole. Most of this is committed to improving the secondary provisions, as their current buildings are very poor (unlike the West Oaks setting). They will be replaced by purpose built, state-of-the-art

facilities which, if our proposals go ahead, primary aged learners would also have access to (given that all the settings would be part on of one through-school with one governance, i.e. the Wellspring Academy Trust). Many of the primary-aged learners at West Oaks would benefit greatly from access to these new and improved facilities under this proposal. As evidenced in Appendix 8, when we talked to children at West Oaks, they were very enthusiastic about the idea of access to more facilities, with many wishing for more outdoor space and improved ICT facilities – this is made under our proposal

### **Location and premises:**

The proposed changes at the Oakwood Lane provision do not include a change of location. However, as above with regard to built environment, including the provision in the new improved through-school provision led by the Wellspring Academy Trust would allow learners at the Oakwood Lane site access to all the buildings and facilities at the other new and improved sites within the provision.

Travel to the site would remain as it is, with no planned changes that would negatively impact learners and their families or disrupt their current routines.

However at present, many learners cannot access the current setting at West Oaks as it cannot cater to a wide enough variety of very complex and varied needs. These learners must be placed in settings outside of Leeds, which results in considerable travel over long distances for many. This is highly disruptive to this specific minority group, whose behaviour on transport can be very challenging at times. It also dislocates these children from their local communities, which is inequitable given that most children and families can expect to access education in or near to their local community. Our proposal seeks to extend the range of needs that can be met, give the recognised expertise and excellence and range of support offered by the Wellspring Academy Trust. This would reduce the numbers of children travelling outside of Leeds significantly; hopefully, this would only be necessary in very specific and unusual circumstances in future. We want to keep these children in their city and be part of their city, not be ‘sent away’ each day which can add to the stigma this minority group often experience. Our proposal would make that possible for more children and young people.

### **Customer care:**

All of the comments above show how the developments proposed would contribute to an improved experience for our children with these complex special educational needs and their families

Moreover, the proposed plans to incorporate the specialist primary provision at Oakwood Lane into the new model of a ‘through school’ for ages 4-19 would also improve flexibility about when learners move from primary provision to secondary provision.

Currently, this is fixed at 11 years. However under the new model, as all provisions would be under one leadership, it would be possible for learners to make this transition earlier at age 10, if one of the secondary age provisions better met their individual needs. This would increase choice, personalisation, and better meet individual needs. As evidenced in Appendix 8, children taking part in consultation on the proposals reacted very favourably to this proposal and considered it a very positive possibility.

The new through-school provision will also include a range of therapeutic interventions

offered by a multi-agency team, which those learners at the Oakwood Lane site provision will also be able to access and benefit from, again improving their individual experiences and outcomes.

It is also notable that a disproportionate number of children looked after by the local authority (LAC) access provision for complex SEMH needs. Improving quality of educational provision is vital in supporting improved outcomes for this vulnerable group.

It is also notable that none of those taking part in consultation – families, children and staff - made any negative comment about the proposal. None felt the proposal should not go ahead.

### **Employment and training:**

In terms of impact on outcomes for children: it is well established in research that educational outcomes for children and young people with complex SEMH needs are typically much poorer than those of their peers. For example, the DfE in 2012/13 found that around 1% of learners in provisions for such needs typically gain 4 GCSES at A\* - C, compared to around 50% of their peers in mainstream schools. This inevitably has an effect on their longer term outcomes in terms of employment. Providing very high quality support for the education of these learners from the earliest opportunity is critical to bucking this trend.

The Wellspring Academy are noted for the ability to deliver provision for these needs rated 'outstanding' by Ofsted and for improving the outcomes and longer term life chances of this vulnerable group. The aim of this proposal is to greatly improve the quality of learning experiences and the ultimate long-term outcomes for these children.

In terms of impact on those staff currently working at the site: should the proposal be approved, a full process of TUPE consultation with the staff would be commenced, with the intention that staff would transfer to the Wellspring Academy Trust and would have certain employment rights secured in line with the results of consultation. Trade Unions would be invited to be involved in the consultation and all legal requirements would be adhered to.

While there may be anxieties for staff around this process, it may also be noted that the Wellspring Academy trust are highly committed to staff development and might be able to offer career progression opportunities which might well be viewed positively. If the proposal is approved and implemented, staff would also perhaps benefit from being part of one larger integrated team with a shared and consistent offer of training, development, and peer support and a strong commitment to equality of opportunity in recruitment practices.

It is vital if a process of TUPE consultation does go ahead we ensure that it is accessible to all staff equally and consider different needs when planning communications. When planning meetings, we should particularly consider the needs of staff with children or other caring commitments and who may not be able to attend 'twilight' meetings after working hours. In other consultations it has been noted that having a written update instead of the opportunity to attend a meeting does not feel like an equitable solution to those taking affected, who want the chance to ask questions in person. This should be considered. It should also be considered if Wellspring can share with staff their commitment to equality of opportunity for all groups and their means of ensuring a representative workforce and

equality of opportunity in career development opportunities – including equal opportunities for newer members of the staff team.

**Financial exclusion:**

As noted in the employment and training section, outcomes for this group of children are typically much poorer than those of their peers. Poor academic outcomes inevitably have an impact on their longer term employability and thus financial well-being. Improving the quality of their learning experience and maximising their opportunities is vital.

**Action required:**

- Note in reporting to the Executive board (*as noted in the paper to which this assessment is attached*) that in consultation with staff, some noted a desire for further facilities at the West Oaks site and felt that equity in quality of the sites across the whole of the proposed through school was imperative.
- Consideration of the responses of those engaged in final part of the consultation process (responding to the publication of the statutory notice) if permission to proceed is given by the Executive Board in March 2016
- Ensure continued regular communications with children and their families as the proposals proceed and if they are implemented.
- Ensure quality, accessible communications with staff as the proposals proceed and if they are implemented. Consider how a range of means of communication to increase accessibility to all i.e. meetings or drop-ins as well as written communications
- Ensure that any communications about the developments are made accessible to children and families and staff and are in plain English and limited quantities of text given there may be varied levels of literacy. Consider how a range of means of communication to increase accessibility to all i.e. meetings or drop-ins as well as written communications; consider timing of meetings, especially those with staff where childcare and other caring commitments are often reported as an issue
- It should also be considered if Wellspring can share with staff their commitment to equality of opportunity for all groups and their means of ensuring a representative workforce and equality of opportunity in career development opportunities – including equal opportunities for newer members of the staff team.
- Managing risks associated with achieving these positive outcomes as per our objectives: see next section (8b).

**8b. Negative impact:**

The following all carry a risk of potential negative impact if not managed effectively. However we do not expect them to have a negative impact if we can manage the risk effectively and our vision is achieved.

**Built environment:**

There is a small risk of unforeseen issues with the building at Oakwood Lane, as there would be with any school building, e.g. effects of severe weather etc. No issues are anticipated but this is possibility that needs to be monitored as with any school building.

Stakeholders have also reported concern that there are no formal plans for improvements to the primary provision at Oakwood Lane (should the proposed plans go ahead), while there will be significant expenditure on developing state-of the-art, purpose –built settings at the other sites for secondary-aged learners, as has already been agreed. This has been noted as inequitable.

### **Information and Communication:**

It is vital that we communicate the proposed changes to all those affected by them effectively and in a way that is accessible to all. If we fail to do so, there is risk that they will be unable to make informed responses to the consultation and experience misunderstanding or confusion that leading to unnecessary anxiety.

### **Timing:**

Timing will be dependent on the outcomes of the proposal and therefore cannot be confirmed at time of writing. There is a small risk of unforeseen issues with delivery of the statutory process of consultation No issues are anticipated but this is possibility that needs to be monitored as with any project.

### **Cost:**

A above, stakeholders have reported concern that there are no formal plans for improvements to the primary provision at Oakwood Lane (should the proposed plans go ahead), while there will be significant expenditure on developing state-of the-art, purpose – built settings at the other sites for secondary-aged learners. This has been noted as inequitable. Any action to improve the buildings would have costs which would need to be accounted for at a time of increasing budget pressures for the Council.

### **Stereotypes and assumptions:**

There is a risk that the responses to the final part of the consultation process (publication of the statutory notice and responses to it; should the Executive Board at March 2016 give permission for this to go ahead) could reflect negative views held by some in terms of these children and young people and the behaviours they may exhibit. Some see these children as 'bad' or 'naughty' rather than troubled and in need of help. This could mean negative responses to the consultation which are influenced by assumptions, rather than knowledge of the typical needs and circumstances of these children.

However it should be noted that in responses to consultation to date, this has not been apparent.

### **Consultation and involvement:**

It is vital that we manage the ongoing consultation processes effectively and using a range of means to ensure accessibility for all affected. If we fail to do so, there is risk that those taking part will be unable to make informed responses to the consultation and experience misunderstanding or confusion that leading to unnecessary anxiety. We do not anticipate any negative impact on any groups if the planned outcomes for the consultation and engagement process are realised. However this will need to be monitored carefully through the project management process (see below, action required).

It is also vital that regular communications with staff at the site are undertaken if the plans do go ahead, as there may be anxieties for them as noted above.

**Action required:**

- Project group to maintain a risk and issue register and monitor risks as above
- Note in reporting to the Executive board (*as noted in the paper to which this assessment is attached*) that in consultation with staff, some noted a desire for further facilities at the West Oaks site and felt that equity in quality of the sites across the whole of the proposed through school was imperative.
- Consideration of the responses of those engaged in final part of the consultation process (responding to the publication of the statutory notice) if permission to proceed is given by the Executive Board in March 2016
- Ensure continued regular communications with children and their families as the proposals proceed and if they are implemented.
- Ensure quality, accessible communications with staff as the proposals proceed and if they are implemented. Consider how a range of means of communication to increase accessibility to all i.e. meetings or drop-ins as well as written communications
- Ensure that any communications about the developments are made accessible to children and families and staff and are in plain English and limited quantities of text given there may be varied levels of literacy. Consider how a range of means of communication to increase accessibility to all i.e. meetings or drop-ins as well as written communications; consider timing of meetings, especially those with staff where childcare and other caring commitments are often reported as an issue
- It should also be considered if Wellspring can share with staff their commitment to equality of opportunity for all groups and their means of ensuring a representative workforce and equality of opportunity in career development opportunities – including equal opportunities for newer members of the staff team.

**9. Will this activity promote strong and positive relationships between the groups/communities identified?**



Yes



No

**Please provide detail:**

Currently, the range of support offered at the Oakwood Lane provision is not sufficient to support the needs of all children in Leeds with varied and highly complex needs. As a result, a significant number of children must access provision outside of Leeds. This situation has a very negative impact on cohesion, in terms of dislocating children from their local community; and is inequitable, in as much as most children in Leeds – including those with other types of complex special educational need – can access education in their local area.

The new academy would be able to extend the range of support offered and would have flexibility in deploying the expertise of the newly integrated staff team across all the new

sites. This should reduce the number of children whose needs cannot be met through our local offer of provision and must be sent outside of Leeds for their education. We want to keep these children in their city and be part of their city, not be 'sent away' each day which can add to the stigma this minority group often experience. Our proposal would make that possible for more children and young people.

**Action required:**

Actions as per item 8 above

**10. Does this activity bring groups/communities into increased contact with each other?** (e.g. in schools, neighbourhood, workplace)

Yes

No

**Please provide detail:** As above

**Action required:**

Actions as per item 8 above.

**11. Could this activity be perceived as benefiting one group at the expense of another?** (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes

No

**Please provide detail:**

It potentially could be perceived that this development is beneficial to children with complex SEMH needs specifically, as opposed to children with other types of special educational need. However no stakeholders, nor respondents to the consultation, have raised this as an issue to date. There appears to be a shared perception that provision in Leeds for this very vulnerable group of children has been poor to date, and that improvements that will benefit them are very welcome.

**Action required:**

Continue to monitor this potential issue in reviewing responses to the final consultation (publication of the statutory notice), should permission to publish be granted by the Executive Board in March 2016.



## 12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
TBC: Project group to maintain a risk and issue register and monitor risks as above	January 2016 (underway already)	Log is available for review at every project group meeting	Chris Sutton reporting to project group (TBC)
Note in reporting to the Executive board ( <i>as noted in the paper to which this assessment is attached</i> ) that in consultation with staff, some noted a desire for further facilities at the West Oaks site and felt that equity in quality of the sites across the whole of the proposed through school was imperative.	March 2016	Issue is noted in report	Natalie Samuel, Sue Bell
Development and implementation of communications strategy	February 16 - completion	Feedback from stakeholders	David Glanville, Chris Sutton reporting to project group
Regular meetings with staff to be incorporated into communications and engagement plan	February 16 - completion	Feedback from stakeholders	David Glanville, Chris Sutton, Steve Tighe
Communications group to consider accessibility of all planned communications with children, families and staff, considering a range of means of communication, not solely reliant on the written word (given levels of literacy may vary considerably amongst families).	February 16 - completion	Feedback from stakeholders	David Glanville, Chris Sutton, Steve Tighe
Project group and communications group to ensure results of any consultation are published and shared with those take part to demonstrate how views shared by stakeholders have been heard and acted upon	April 16 and June 16 (final decision on developments by Executive Board)	Feedback from stakeholders	David Glanville, Chris Sutton, Steve Tighe
Consideration of the responses of those	April 2016 – June 2016	Any equality issues	Sue bell reporting to project

<b>Action</b>	<b>Timescale</b>	<b>Measure</b>	<b>Lead person</b>
engaged in final part of the consultation process (responding to the publication of the statutory notice) if permission to proceed is given by the Executive Board in March 2016		raised when statutory notice is published	group
If implementation does go ahead: ensure fully accessible process of TUPE consultation is implemented, involving all staff and Trade Unions. Ensure accessibility for all and consider timings of meetings, given that staff may have childcare and other caring commitments after school hours.	April – July 2016 (TBC)	Feedback from staff	Yvonne Fletcher (HR) supported by Communication Group and Wellspring Academy Trust and reporting to project group
If implementation does go ahead: consider if Wellspring can share with staff their commitment to equality of opportunity for all groups and their means of ensuring a representative workforce and equality of opportunity in career development opportunities – including equal opportunities for newer members of the staff team.	April – July 2016 (TBC)	Feedback from staff	Yvonne Fletcher (HR) supported by Communication group and Wellspring Academy Trust reporting to project group

**13. Governance, ownership and approval**

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
SEMH project board chair Paul Brennan	Deputy Director (Learning Skills and Universal Services) Children's Services	25/02/2016
<b>Date impact assessment completed</b>		25/002/2016

**14. Monitoring progress for equality, diversity, cohesion and integration actions** (please tick)

- As part of service planning performance monitoring
- As part of project monitoring
- Update report will be agreed and provided to the appropriate board  
Please specify which board
- Other (please specify)

**15. Publishing**

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality impact assessment should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality impact assessments that are not to be published should be sent to [equalityteam@leeds.gov.uk](mailto:equalityteam@leeds.gov.uk) for record.

Complete the appropriate section below with the date the report and attached assessment was sent:

For Executive Board or Full Council – sent to <b>Governance Services</b>	Date sent: 24/02/16
For Delegated Decisions or Significant Operational Decisions – sent to appropriate <b>Directorate</b>	Date sent:
All other decisions – sent to <a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>	Date sent: