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Ask for:
Date: 12.04.16

Dear Member

SCRUTINY COMMITTEE - TUESDAY, 19 APRIL 2016

I am now able to enclose, for consideration at next Tuesday, 19 April 2016 meeting of the Scrutiny Committee, the following reports which were unavailable when the agenda was printed.

**Additional information relating to:
Agenda Item No**

C2 **Ensuring the provision of sufficient denominational school places in Kent**
 (Pages 3 - 36)

Additional information supplied relating to this item:

- **Pages 3-10** The Education Commission on behalf of Archdiocese of Southwark. Response to Draft Commissioning Plan for Education Provision In Kent 2016 – 2020.
- **Pages 11-36** Equalities Impact Assessment of the Principles and Guidelines contained in the Commissioning plan for Education provision 2016-20

Yours sincerely

Peter Sass
Head of Democratic Services

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**The Education Commission
on behalf of
Archdiocese of Southwark.**

**Response to
Draft Commissioning Plan for
Education Provision
In Kent 2016 – 2020.**

**Education
Commission**
CATHOLIC DIOCESE OF SOUTHWARK



Introduction

The Education Commission of the Archdiocese of Southwark would like to thank you for sharing the Local Authority's draft commissioning plan for Education Provision in Kent and we welcome the opportunity to offer a response to the draft plan.

The Archdiocese of Southwark seeks assurance that the need for additional new school places is reflected proportionally both within the Catholic sector and the Faith Sector at large.

We would propose that the Local Authority with the clear accountability for ensuring that a fair, inclusive and transparent process brings all relevant local responsible bodies together effectively to understand each other's needs, the relevant legal requirements to which these bodies are subject and to agree local priorities. This would lead to an effective plan to deliver on agreed priorities from the capital available.

All responsible bodies must be fairly represented to ensure that the best outcomes are achieved for all Kent children, rather than there being a perceived bias towards the local authority sector.

Response to the draft Commissioning Plan

Our response reflects on the paragraphs outlined in italics below and on subsequent pages.

4.4 Principles and Guidelines

It is important that the Local Authority is open and transparent in its role as the Strategic Commissioner of Education. To help guide us in this role we abide by clear principles, and consider school organisation proposals against our planning guidelines. We stress that planning guidelines are not absolutes, but a starting point for the consideration of proposals.

4.5 These are our Over-Arching Principles:

- * We will always put the needs of the learners first.*
 - * Every child should have access to a local good or outstanding school, which is appropriate to their needs.*
 - * All education provision in Kent should be financially efficient and viable.*
 - * We will aim to meet the needs and aspirations of parents and the local community.*
 - * We will promote parental preference.*
 - * We recognise perceptions may differ as to benefits and detrimental impacts of proposals. We aim to ensure our consultation processes capture the voice of all communities. To be supported, proposals must demonstrate overall benefit.*
 - * The needs of Children in Care and those with SEN and disabilities will be given priority in any commissioning decision.*
-

Considering the over-arching principles above how are KCC intending to ensure that every child has access to a local good or outstanding school, which is appropriate to their needs if the child wants to attend a Catholic School? How will KCC promote parental preference if the parents want their child educated in a Catholic school? We consider that Catholic parents should be able to access education for their children at Catholic schools. There are

also other Christian communities who traditionally wish to send their children to Catholic schools e.g. the Greek and other Orthodox communities.

Primary schools

In 2015, 15 out of the 26 Catholic primaries had 1st preference applications over and above their PAN. Which means about 163 children did not succeed in obtaining a place in a Catholic school of their choice in Kent. Because of the distances between the schools this means that their 2nd preference school may well not be a Catholic school.

4.6 Planning Guidelines – Primary:

- *The curriculum is generally delivered in key stage specific classes. Therefore, for curriculum viability Primary schools should be able to operate at least four classes.*
 - *We will actively look at federation opportunities for small Primary schools.*
 - *Where possible, planned Published Admission Numbers (PANs) will be multiples of 30 but where this is not possible, multiples of 15 are used.*
 - *We believe all through Primary schools deliver better continuity of learning as the model for Primary phase education in Kent. When the opportunity arises we will either amalgamate separate infant and junior schools into a single Primary school or federate the schools. However, we will have regard to existing local arrangements and seek to avoid leaving existing schools without links on which they have previously depended.*
 - *At present Primary school provision is co-educational, and we anticipate that future arrangements will conform to this pattern.*
 - *Over time we have concluded that 2FE provision (420 places) is preferred in terms of the efficient deployment of resources.*
-

We agree with your conclusion that 2FE is preferred in terms of the efficient deployment of resources. Consequently we would take this further to conclude 2FE will aid the provision of efficient education particularly where there are 1½FE schools with mixed age classes.

We also agree the overarching principle that all education provision in Kent should be financially viable and efficient and we advocate that KCC take the opportunity to expand Catholic schools that are below 2FE Most particularly the two schools that are 1½FE.

There are 22 Catholic primaries out of 26 that fall below the 2FE benchmark for efficient financial viability. This is 84.57% of our schools that that are, in KCC terms, not financially viable and we have an expectation that the Commissioning Plan will propose that the areas of high need Catholic schools under the 2FE benchmark will be identified for expansion.

4.9 Planning Guidelines - Expansion of Popular Schools and New Provision

- *We support diversity in the range of education provision available to children and young people. We recognise that new providers are entering the market, and that parents and communities are able to make free school applications.*
 - *We also recognise that popular schools may wish to expand, or be under pressure from the local community to do so.*
 - *As the Strategic Commissioner of Education Provision, we welcome proposals from existing schools and new providers that address the needs identified in this Plan, which include new provision to meet increased demand, and new provision to address concerns about quality.*
 - *In order for us to support any such proposal, they must meet an identified need and adhere to the planning principles and guidelines set out above.*
-

We agree that KCC should recognise the need for popular schools to expand, or be under pressure from the local community to expand. There are 6 Catholic schools that are over-subscribed year on year. The Diocese and the Catholic community will be looking to the

Commissioning Plan to recognise the need to consider the expansion of popular and successful schools Catholic schools.

Using the recorded baptism figures alone the likelihood is that by 2017 we will have 9 schools that will be substantially over-subscribed, some by one form of entry. The baptism figures do not, of course, make allowance for inward migration to Kent from other parts of the UK or abroad. Neither do they allow for other Christian communities, e.g. Orthodox Christians, who traditionally prefer to send their children to Catholic schools.

To illustrate where the Diocese is seeking to expand primary schools to meet both the needs of the Catholic and local community we have constructed a Venn diagram for each the Kent areas (pages 5-8).

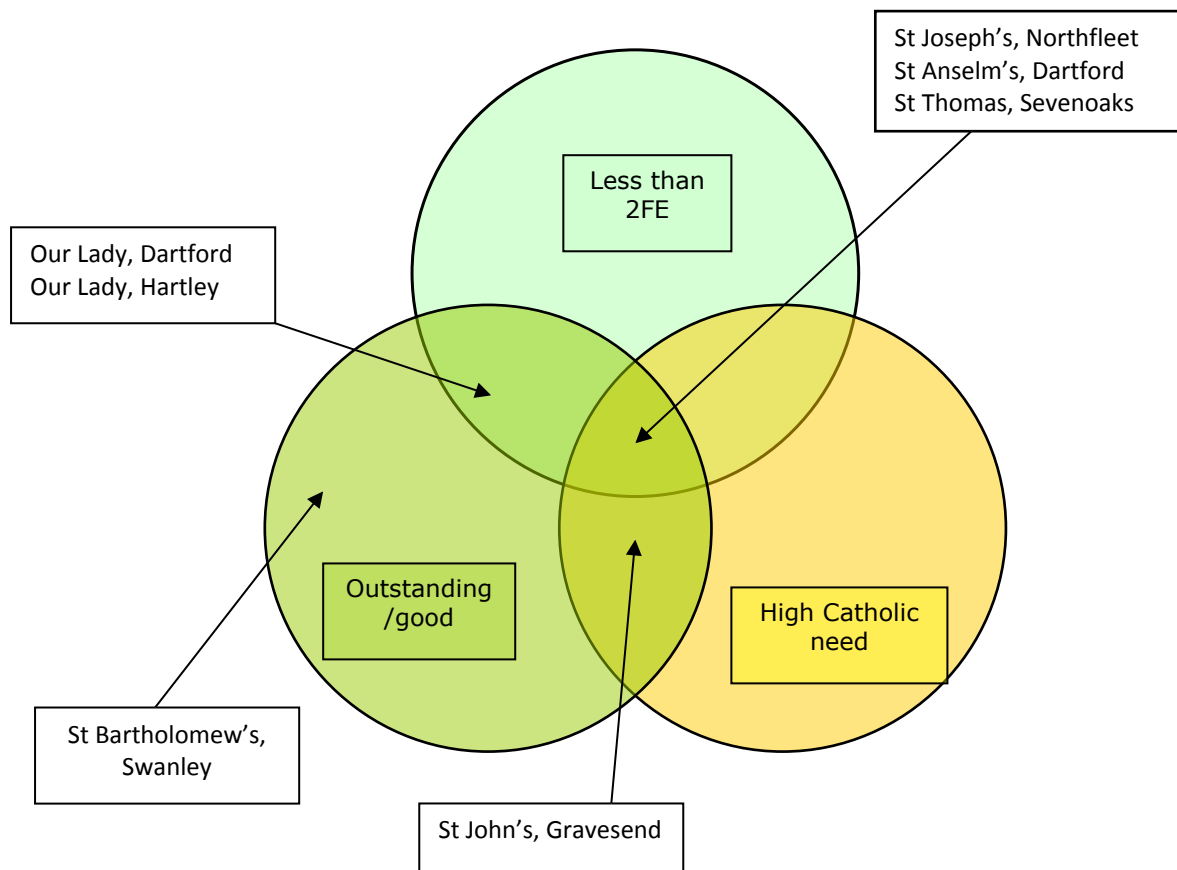
Attention is focused on the three areas highlighted within the draft Commissioning Plan:

- 1) Schools that are good to outstanding
- 2) Schools below 2FE in size
- 3) Schools where there is an acute/high parental demand for Catholic places.

Secondary schools

We agree with the draft Commissioning Plan that the expansion of secondary schools is becoming increasingly important.

The total number of places available at present at Catholic secondary schools at Year 7 is 880. Projecting the Catholic primary admissions forward approximately 1100 Catholic pupils will need places at the secondary schools in 2020. Allowing for some inward migration into the county this will give an undersupply of about 7-8FE. There is a case for expanding Catholic secondary schools to meet the need for Catholic pupils and the wider community. There is an expectation that the Commissioning Plan will recognise the need to expand Catholic schools. As the 7-8FE is spread across the county each of the Catholic schools could be expanded by at least 1-1.5 FE each.

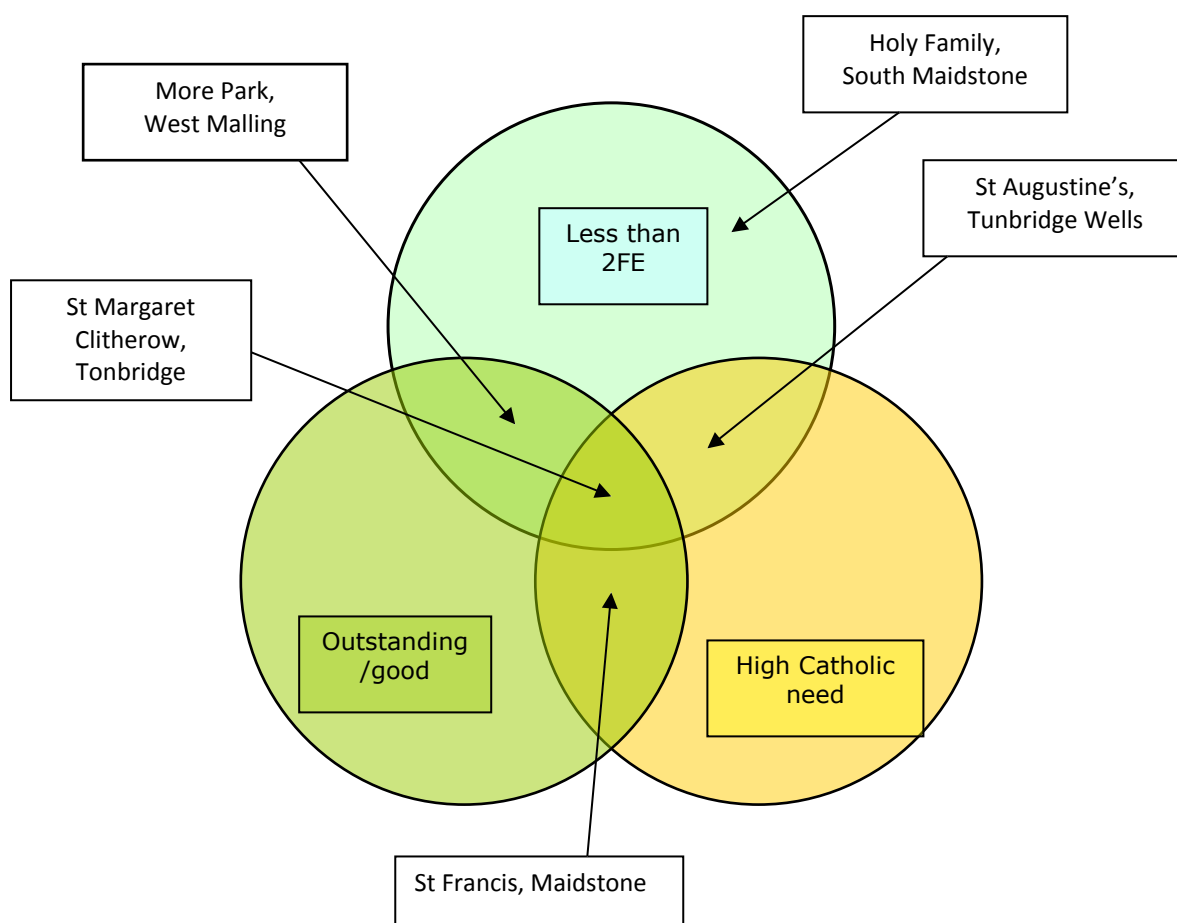


North Kent - Catholic Primary Schools

Parish	School	Baptisms					PAN
		2010	2011	2012	2013	2014	
Dartford (St Vincent)	St Anselm's	77	43	55	55	63	30
Dartford	Our Lady's	22	37	29	20	20	30
Gravesend	St John's	100	84	81	99	151	90
Hartley	Our Lady of Hartley	12	11	12	7	10	30
Northfleet	St Joseph's	24	29	32	41	30	30
Sevenoaks	St Thomas	72	84	66	59	57	30
Swanley	St Bartholomew's	11	11	11	16	17	50

Parishes without Primary Schools

Edenbridge	St Thomas, Sevenoaks	11	12	7	7	9
Meopham	Our Lady of Hartley	2	1	2	0	3
Westerham	St Thomas, Sevenoaks	10	13	6	6	7

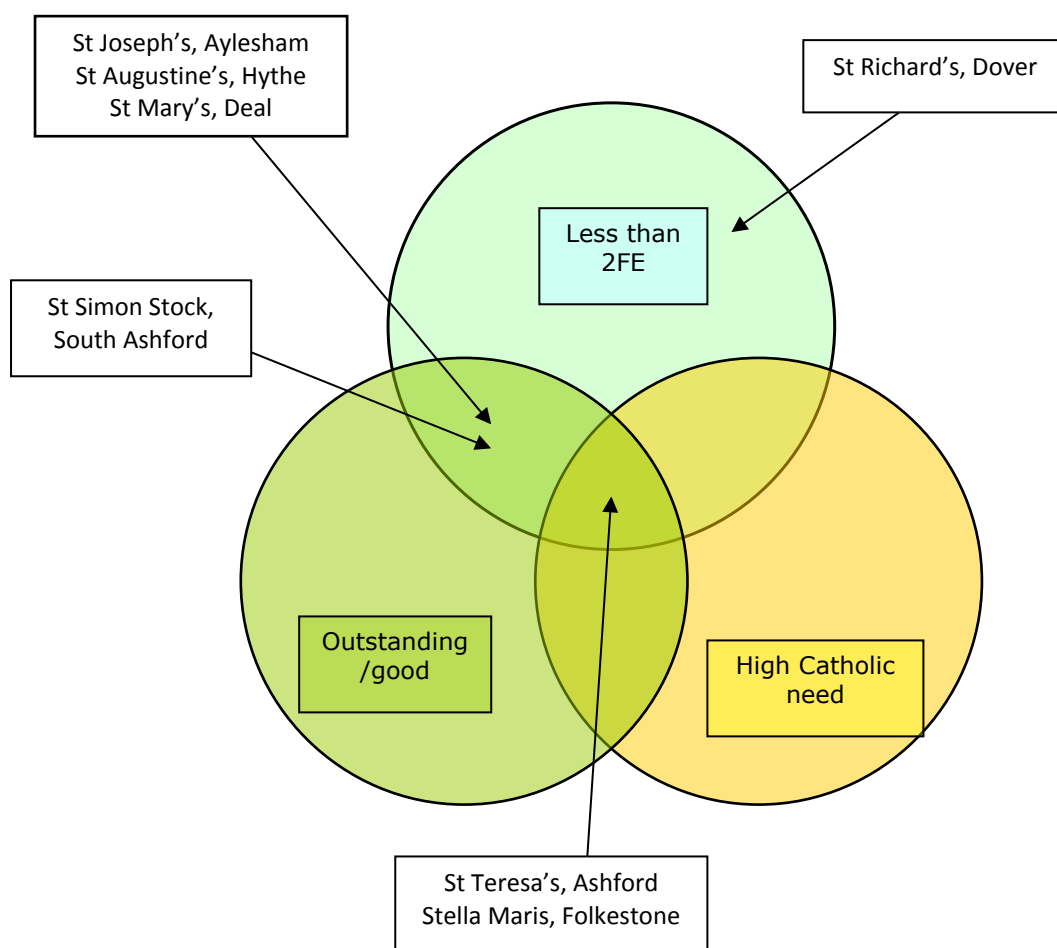


West Kent - Catholic Primary Schools

Parish	School						PAN
		2010	2011	2012	2013	2014	
Maidstone (South)	Holy Family	21	14	6	11	16	30
Maidstone	St Francis	79	107	115	83	107	60
Tonbridge	St Margaret Clitherow	23	28	23	35	21	60
Tunbridge Wells	St Augustine's	75	64	62	64	61	45
West Malling	More Park	33	32	39	27	44	30

Parishes without Primary Schools

Parish	Nearest school	Baptisms				
		2010	2011	2012	2013	2014
Bearstead & Harretsham	St Francis, Maidstone	7	8	13	15	9
Cranbrook	Holy Family, Maidstone	4	3	10	2	3
Paddock Wood	St Margaret-Clitherow, Tonbridge	9	7	1	5	3
Pembury	St Augustine's, T-Wells				3	1
Southborough	St Augustine's, T-Wells	16	14	4	13	11

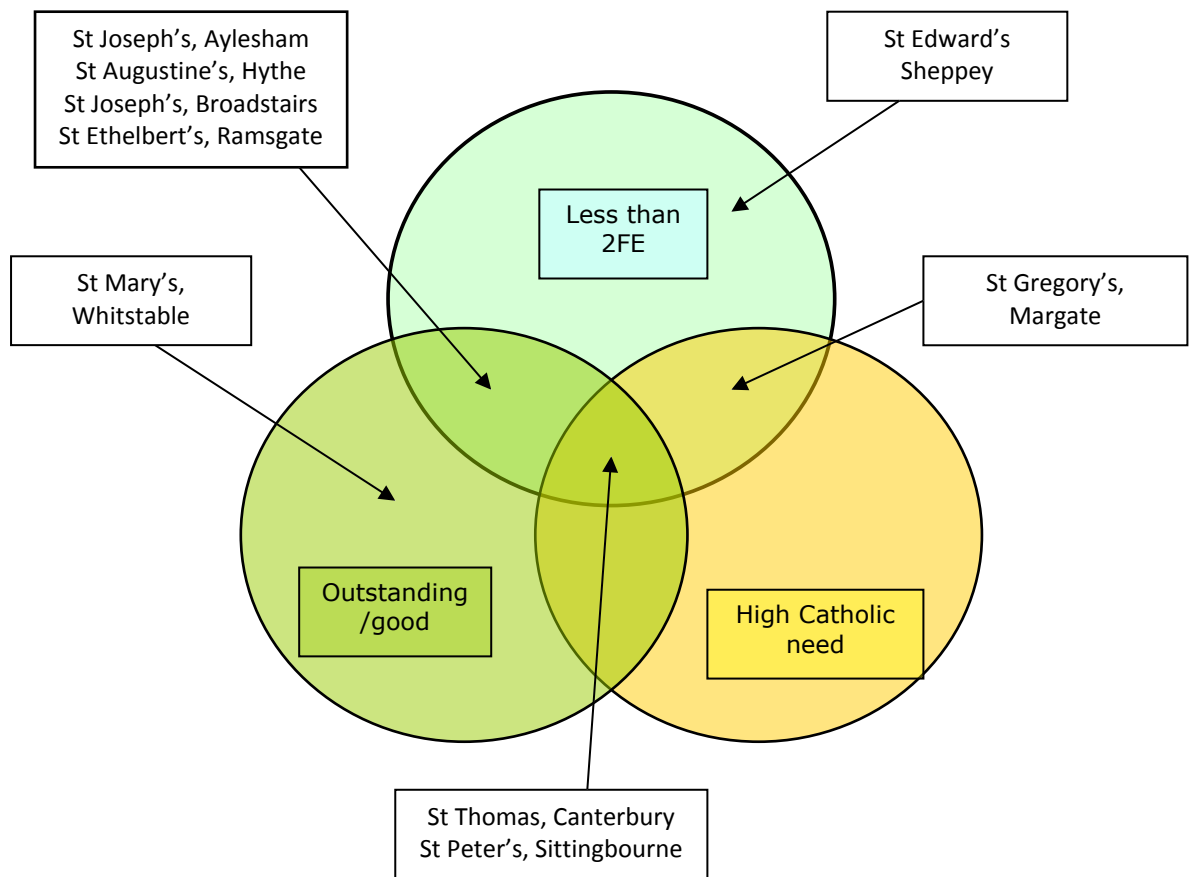


South Kent - Catholic Primary Schools

Parish	School	Baptisms					PAN
		2010	2011	2012	2013	2014	
Ashford (South)	St Simon of England	15	16	17	39	29	30
Ashford	St Teresa's	40	57	48	14	47	30
Aylesham	St Joseph's	9	12	13	11	11	15
Deal	St Mary's	7	7	2	4	6	30
Dover	St Richard's	14	15	11	9	13	30
Folkestone	Stella Maris	47	52	42	32	27	30
Hythe	St Augustine's	12	21	25	21	25	30

Parishes without Primary Schools

Parish	Nearest school	Baptisms				
		2010	2011	2012	2013	2014
Mongeham & Sandwich	St Mary's, Deal	10	14	4	5	3
Tenterden	St Simon, South Ashford	3	6	6	3	1



East Kent - Catholic Primary Schools

Parish	School	Baptisms					PAN
		2010	2011	2012	2013	2014	
Aylesham	St Joseph's	9	12	13	11	11	15
Broadstairs	St Joseph's	22	14	10	17	23	30
Canterbury	St Thomas	47	54	62	38	38	30
Hythe	St Augustine's	12	21	25	21	25	30
Margate	St Gregory's	28	19	47	34	34	45
Ramsgate & Minster	St Ethelbert's	24	28	39	31	33	30
Sheppey	St Edward's	17	26	15	28	23	30
Sittingbourne	St Peter's	22	21	31	29	21	30
Whitstable	St Mary's	6	24	18	19	18	60

Parishes without Primary Schools

Parish	Nearest School	Baptisms				
		2010	2011	2012	2013	2014
Cliftonville	St Gregory's, Margate	22	23	Merged with Thanet parish		
Faversham	St Peter's, Sittingbourne	16	14	16	12	12
Herne Bay	St Mary's, Whitstable	16	25	27	14	23
Hersden	St Thomas, Canterbury	2	1	0	1	3
Thanet	St Gregory's, Margate	12	3	3	3	7

**KENT COUNTY COUNCIL
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

**This document is available in other formats, Please contact
alternativeformats@kent.gov.uk OR
telephone on 03000 421533.**

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Directorate: Education And Young Peoples' Services

Name of policy, procedure, project or service: Commissioning Plan for Education Provision in Kent

What is being assessed? Equalities Impact Assessment of the Principles and Guidelines contained in the Commissioning plan for Education provision 2016-20

Purpose of the Plan

The Plan provides an overarching framework for determining when and where education provision may be needed in the future. It sets out the forecast number of children and young people in Kent, and breaks this down to smaller geographical areas (Districts and planning groups within these) to show where there may be a need for more or fewer places. The Plan also sets out the principles which will be used to consider and evaluate individual proposals which might come forward (be commissioned) to address any identified shortage or surplus of places in a locality. In respect of an equality impact assessment, we believe that this would be carried out at two levels.

First, in respect of the Commissioning Plan itself, the assessment is whether the commissioning principles and guidelines may have an impact (either positive or negative) on any groups who have protected characteristics, and if so what action, if any, should be taken to amend the Plan or to mitigate the negative impacts; and second, a more detailed analysis of the impacts on any group arising from any proposals received as a consequence of individual commissions.

This Equality Impact Assessment deals solely with the first of these two levels, namely the principles and guidelines of the Commissioning Plan for Education Provision.

Responsible Owner/ Senior Officer: David Adams

Date of Initial Screening: 13-11-15

Date of Full EqIA : 13-11-15

Version	Author	Date	Comment
1	David Adams	13-11-15	
2	David Adams	18-11-15	

Introduction:

A county of differences

- Kent's diversity is clear to see when we look at the difference between the richest and poorest areas in the county. For example, in Tunbridge Wells, only 4% of the population is amongst the poorest 20%, while in Thanet it is 42%. Pockets of significant deprivation are found across Kent.
- Numbers of children achieving the expected level in English and Maths when they leave primary school varies by 10.7% between the best and worst performing areas, and children from low-income families, those with special educational needs and looked after children do less well than children who are not in these circumstances.
- Kent is a collection of diverse small towns - there is no big city.

A Place of Change

- Over 110,000 new dwellings are currently planned in Kent by 2031. Forecasts show that there will be the greatest increases in Canterbury, Maidstone and Dartford. This demand for housing places pressure on all services and public infrastructure – and shapes the school organisation challenges that we face in the future.

A Place of Diversity and Choice

- As at May 2015 there are approximately 222,000 pupils aged 5-16 educated in Kent schools. Of these 49% are girls (and 51% are boys); 11.9% are eligible for Free School Meals; 2.9% have Statements of Special Educational Needs; 17% are from ethnic minority backgrounds; 9.5% have English as an Additional Language.
- There are 2005 private and voluntary early years' providers and accredited child-minders, 68 maintained nursery classes and one maintained nursery school, 28 infant schools, 28 junior schools, 399 Primary schools, 99 Secondary schools, 23 Special schools and 7 Pupil Referral Units.
- The County has a diversity of provision with 182 community schools, 185 academies, 34 foundation schools including a number of trusts and 153 Voluntary Aided/Voluntary Controlled schools, the majority belonging to Canterbury and Rochester Church of England Dioceses and the Roman Catholic Archdiocese of Southwark, plus Methodist provision. There are 67 non-selective Secondary schools (of which five are single sex) and 32 grammar schools (of which 26 are single-sex).

- There is a wide variety of providers of schools each bringing their own ethos and ideas to the system. This provides parents with choice and helps all schools continue to improve as each learns from the successes and innovations of others.
- We aim to support and work with all schools in Kent, to ensure all children and young people in Kent have the very best education opportunities and achieve well.
- There are six further and higher education colleges in Kent, based on several sites across the County.
- Approximately 7000 pupils in Kent pupils, 2.9% of Kent's school population, have a Statement of Special Educational Needs (SEN) or Education and Health Care Plan (EHCP) and the Local Authority is responsible for commissioning their school place. Currently over 60% of these pupils attend a specialist provision in either a resourced base provision in a mainstream school or in a special school.
- Kent places 780 children and young people with a Statement are placed in independent and non-maintained Special schools. Where Kent makes this type of placement it usually reflects a good use of resources for low incidence disabilities or where Kent's own maintained provision is at capacity. However, it means that that these children and young people currently attend schools in the independent and non-maintained sector because their special educational needs cannot be met in a local Kent school. The largest numbers of pupils have autism spectrum disorder needs or emotional, social and behavioural needs. We aim to increase the provision for these kinds of needs in Kent Special and mainstream schools. The Commission plan aims to address the need for further SEND provision across the county.

Equality Impact Assessment

The EqlA will focus on the overarching principles and the planning guidelines for commissioning school places in the County as these will guide future provision and are the areas to be consulted.

These are our over-arching principles:

1. All maintained schools will be able to function as high-quality, viable and financially efficient provisions.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High			
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		Positive for all children. A school remaining viable is critical to the quality of education it can provide, and is fundamental to providing the range of choice we aspire to for our communities.
Religion or belief	No	High	Low		
Sexual orientation	No	N/A	N/A		
Pregnancy and maternity	No	N/A	N/A		
Marriage and Civil Partnerships		N/A	N/A		We recognise that in areas of high surplus capacity actions taken to reduce surplce may impact on parental choice. Further equality impact assessments specific to those consultations will be undertaken at that point.

					These assumptions will be tested as part of individual school consultation processes.
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2. Every child has access to a local good or outstanding school, which is appropriate to their needs.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'. Positive for children with SEN who will have school places that meet their educational needs
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low	Assumption will be tested through consultation.	
Religion or belief	No	High	Low		These assumptions will be tested as part of individual school consultation processes.
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

3. The needs of Children in Care and those with SEN will be given priority in any commissioning decision.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		Positive for children with SEN and disabilities.
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		Looked after children will be able to access educational provision across the county
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		Consultation will seek to elicit views in relation to this priority. These assumptions will be tested as part of individual school consultation processes.

4. Any educational provision facing challenges in difficult times will be supported and challenged to recover in an efficient and timely manner, but where sufficient progress is not so achieved we will seek to commission alternative provision or another provider.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Children have one opportunity to receive a good education. Acting to ensure they receive this and do not languish in inadequate provision is essential. (Also see 5 below)
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		The impact of any individual proposal or set of related proposals would be considered at the time. These assumptions will be tested as part of individual school consultation processes.
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

5. If a provision is considered or found to be inadequate by Ofsted, we will seek to commission alternative provision where we and the local community believe this to be the quickest route to provide high quality provision.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low	The equality impact of any individual proposal or set of related proposals would be considered at the time. Where any proposal is identified as having negative impacts on any particular group which has a protected characteristic, consideration would be given to whether the benefits outweigh the disadvantages, and of any mitigation which might be appropriate	Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'. Overall positive for communities as schools need to be good or better. (See 1. above) These assumptions will be tested as part individual school consultation processes.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

6. We will aim to meet the needs and aspirations of parents and the local community.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'. These assumptions will be tested as part of individual school consultation processes.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

7. We will always put the needs of the learners first.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>This approach means that we will aim to meet the educational needs of all pupils including the most vulnerable learners.</p> <p>These assumptions will be tested as part individual school consultation processes.</p>
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

8. We will promote parental preference.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		School choice and diversity means that provision will respond to a range of needs within a community.
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		These assumptions will be tested as part of individual school consultation processes.
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

9. We will give priority to organisational changes within schools that create environments better able to meet the needs of vulnerable children, including those who have SEN and disabilities, come from minority ethnic communities and/or from low income families.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>Positive for children with SEN and disabilities and those from minority communities and/or from low income families. Supports the delivery of 'Working Together Improving Outcomes'. The Strategy for Children and Young People with Special Educational Needs and Disabilities 2013-2016</p> <p>These assumptions will be tested through Consultation.</p>
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

10. In areas of high housing growth we will actively seek developer contributions to fund or part fund new and additional provision.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Positive for all children.
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		Social Cohesion - mixed housing provision - ie proportion of social and private dwellings
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		
					Easier access for all to a local provision.
					These assumptions will be tested through Consultation.

11. Organisational changes should promote greater diversity of provision in a locality.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Positive for all in the locality.
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		Positive for parental preference.
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

These assumptions will be tested through Consultation.

12. We will ensure we make the most efficient use of resources.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'. These assumptions will be tested through Consultation.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

13. Planning Guidelines – Primary:

- The curriculum is generally delivered in key stage specific classes. Therefore, for curriculum viability schools should be able to operate at least 4 classes.
- We will actively look at federation opportunities for small primary schools.
- Where possible, planned Published Admission Numbers (PANs) will be multiples of 30 (where this is not possible, multiples of 15 will be preferred).
- We believe all through Primary schools deliver better continuity of learning as the model for Primary phase education in Kent. When the opportunity arises we will either amalgamate separate infant and junior schools into a single Primary school or federate the schools. However, we will have regard to existing local arrangements and seek to avoid leaving existing schools without links on which they have previously depended.
- All present Primary school provision is co-educational, and we anticipate that future arrangements will conform to this pattern.
- Over time we have concluded that 2fe provision (420 places) is preferred in terms of the efficient deployment of resources.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Overall positive for all children as the quality of provision is of primary concern. The planning guideline may be more difficult to comply with by
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Pregnancy and maternity	N/A	N/A	N/A		<p>minority groups, for example to promote a school with a religious characteristic, hence the guidance is “should” rather than “must”. Consideration of the merits of the individual proposal, against the broad range of principles and guidelines, and our equalities duties would be made at the time.</p> <p>These assumptions will be tested as part individual school consultation processes.</p>
Marriage and Civil Partnerships	N/A	N/A	N/A		

14. Planning Guidelines – Secondary:

- All schools must be able to offer a broad and balanced curriculum and progression pathways for 14-19 year olds either alone or via robust partnership arrangements.
- PANs for Secondary schools will not normally be less than 120 or greater than 360. PANs for Secondary schools will normally be multiples of 30.
- Over time we have concluded that the ideal size for the efficient deployment of resources is between 6fe and 8fe.
- All but two of our Secondary schools admit pupils at age 11. Any new Secondary provision would be expected to follow this model, except where it is proposed to be all-aged (Primary and Secondary).
- Proposals for additional Secondary places need to demonstrate a balance between selective and non-selective school places.
- We will encourage the formation of all-aged schools where this is in the interests of the local community.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Positive for all children.
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		Overall positive for all children as the quality of provision is of primary concern. The planning guideline may be more difficult to comply with by
Pregnancy and	N/A	N/A	N/A		

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
maternity					<p>minority groups, for example to promote a school with a religious characteristic, hence the guidance is “will not normally” rather than “must”.</p> <p>Consideration of the merits of the individual proposal, against the broad range of principles and guidelines, and our equalities duties would be made at the time.</p> <p>There are a number of single sex secondary schools in Kent, predominantly selective schools. The need to ensure sufficient provision exists for both boys and girls will be part of a specific commissioning decision in areas where this is relevant. Where we are proposing to make changes at single sex secondary schools these gender issues will need to be taken into account.</p>
Marriage and Civil Partnerships	N/A	N/A	N/A		

15. Planning Guidelines - Special Educational Needs:

- We aim, over time, to build capacity in mainstream settings, by broadening the skills and special arrangements that can be made within this sector to ensure compliance with the relevant duties under SEN and disability legislation.
- For children and young people where mainstream provision is not appropriate, we seek to make provision through Kent Special schools. For young people aged 16–19 provision may be at school or college. For young people aged 19–25 provision is likely to be college based.
- We recognise the need for children and young people to live within their local community where possible and we seek to provide them with day places unless residential provision is needed for care or health reasons. In such cases agreement to joint placement and support will be sought from the relevant KCC teams or the Health Service.
- We aim to reduce the need for children to be transported to schools far away from their local communities.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		It is also anticipated that Planning Guidelines for children and young people with SEN will have a positive impact on the provision of school places for this group. Specifically, it is anticipated that this will have a positive impact for children and
Race	No	High	Low		
Religion or belief	No	High	Low		
Sexual orientation	N/A	N/A	N/A		
Pregnancy and maternity	N/A	N/A	N/A		

Marriage and Civil Partnerships	N/A	N/A	N/A		young people with disabilities. These assumptions will be tested as part of individual school consultation processes.
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16. Planning Guidelines - Expansion of Popular Schools and New Provision

- We support diversity in the range of education provision available to our children and young people. We recognise that new providers are entering the market, and that parents and communities are able to make free school applications.
- We also recognise that popular schools may wish to expand, or be under pressure from the local community to do so.
- As the Strategic Commissioner of Education Provision, we welcome proposals from existing schools and new providers that address the needs identified in this Plan, which include new provision to meet increased demand, and new provision to address concerns about quality.
- In order for us to support any such proposal, they must meet an identified need and adhere to the planning principles and guidelines set out above.

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age	No	High	Low		Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability	No	High	Low		
Gender	No	High	Low		
Gender identity	N/A	N/A	N/A		Overall these guidelines are positive. Increasing access to high quality education provision
Race	No	High	Low		
Religion or belief	No	High	Low		

Sexual orientation	N/A	N/A	N/A		benefits all, and increases parental choice. Any negative impact on neighbouring schools, and therefore children's education, would be considered as part of the evaluation of individual proposals. This would include the impact on groups with protected characteristics. These assumptions will be tested as part individual school consultation processes.
Pregnancy and maternity	N/A	N/A	N/A		
Marriage and Civil Partnerships	N/A	N/A	N/A		

The County Council's goals by 2018 are to ensure:

Goal	Equalities Impact
There will be more good schools, with at least 90% of Primary and Secondary schools judged as good or outstanding. 97% of Special schools will be good or outstanding.	Positive for all children and particularly for vulnerable groups of children including children with SEN and disabilities.
Ensure at least 86% of families secure school places at their first preference Primary school, and 85% secure school places at their first preference Secondary school. At least 94% secure either their first or second preference at both Primary and Secondary school.	No particular negative equality impact is perceived. However, if further analysis of local circumstances indicates that disproportionately any group with a protected characteristic is not achieving goal, an action plan to address the situation will be developed.
Maintain between 5% and 7% surplus capacity in schools across the County.	This is positive in that it provides spare places for groups such as traveller children, children whose parents are in the armed forces and both national and international migration into the county. It also enables parental preference.
Ensure there is at least 5% surplus Year R places in 8 of the 12 districts in Kent.	This is positive in that it provides spare places for groups such as traveller children, children whose parents are in the armed forces and both national and international migration. It also enables parental preference.
To make appropriate provision for children with special educational needs so as to reduce the number of pupils who need to attend independent and out of county provision by 212 places.	Making appropriate local provision available is positive for children with special educational needs and will have a positive impact for the disability protected characteristic.

Conclusion

The over-arching nature of the Commissioning Plan for Education Provision 2016-20 means that the equalities impact assessment is also at a strategic, rather than specific level. In broad terms the Plan focuses on the positive impacts for all children and young people, particularly the most vulnerable pupils and those with SEND. It will provide a vehicle through which individuals and groups can make their voices heard regarding both current education provision and future proposals.

An equality impact assessment will be completed as part of each individual consultation process that follows on from the commissioning plan.

This assessment indicates that in line with our legal duties, the principles and planning guidelines, and thus commissioning decisions, there should be no impact on characteristics identified in the sections above.

A handwritten signature in black ink, appearing to read 'D. Adams', with a horizontal line underneath.

David Adams
Area Education Officer (South Kent)

16 November 2015

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