

**Kent County Council  
Equality Analysis/ Impact Assessment (EqIA)**

**Directorate/ Service:**

*Children, Young People and Education*

**Name of decision, policy, procedure, project or service:**

Proposed increase of the Designated Number of places at Broomhill Bank School

**Responsible Owner/ Senior Officer:**

Nick Abrahams, Area Education Officer, Kent County Council

**Version: 1**

**Author:** Paul Wilson

**Pathway of Equality Analysis:** N/A

**Summary and recommendations of equality analysis/impact assessment.**

• **Context**

KCC, as the Local Authority, has a statutory duty to ensure sufficient school places are available. This duty applies to Special Education Needs (SEN) provision, as well as mainstream settings. The County Council's Commissioning Plan for Education Provision in Kent 2020-24 is a five-year rolling plan which is updated annually. It sets out KCC's future plans as Strategic Commissioner of Education Provision across all types and phases of education in Kent. A copy of the plan can be viewed from this link: <http://www.kent.gov.uk/about-the-council/strategies-and-policies/education-skills-and-employment-policies/education-provision>

The Commissioning Plan sets out the commissioning intentions for Special Educational Needs (SEN), which include overarching aims to:

- Increase the educational, health and emotional wellbeing outcomes for Kent's children and young people with SEN and disabilities.
- Ensure Kent delivers the Statutory changes (required by the Children and Families Act 2014)
- Address gaps in provision for children and young people with SEN and disabilities, improve the quality of provision, develop the broadest range of providers, and encourage a mixed economy of provision.

The Commissioning Plan highlights the SEN place pressure that Kent has experienced, with the number of Education Health and Care Plans (EHCPs) increasing significantly in recent years. The most prevalent and fastest growing need type is ASD (Autistic Spectrum Disorder) and data indicates that 40% of children and young people aged 0-25 years with EHCPs have ASD as their primary need type.

The demand for places at Broomhill Bank School has increased commensurately, with strong parental preference. Broomhill Bank has a Designated Number of 210, but there is pressure for the school to accept additional pupils to meet demand in both West and North Kent.

Feasibility work and curriculum analysis has been undertaken across both school sites to ensure the school can meet the needs of the additional number of pupils proposed. This work indicates that the school will need increased classroom provision, car parking and school access changes; alongside enhancement of existing sports provision at the Broomhill Bank North site at Swanley, and additional sports provision at the West site in Tunbridge Wells. Additional modular accommodation will be required on both the West and North sites as well as internal reconfiguration within existing buildings.

- **Aims and Objectives**

The Broomhill Bank School Governing Body and KCC wish to provide more ASD places in West and North Kent via a proposed increase of the Designated Number from 210 to 318 places change at Broomhill Bank School, Broomhill Road, Royal Tunbridge Wells, Tunbridge Wells, TN3 0TB from September 2020.

- **Summary of equality impact**

No adverse impacts have been identified at this stage; however, the outcome of the public consultation and community consultation will enable the KCC and the school to test out these assumptions.

**Adverse Equality Impact Rating** **Low**

**Attestation**

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning the proposed change at Broomhill Bank School. I agree with the risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

**Senior Officer**

Signed:  
Job Title: Area Education Officer

Name: Nick Abrahams  
Date: 29 April 2020

**DMT Member**

Signed:  
Job Title: Interim Director – Education  
April 2020

Name: David Adams  
Date: 29

**Part 1 Screening**

**Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent? Could this policy, procedure, project or service promote equal opportunities for this group?**

| Protected Group                            | Please provide a <b>brief</b> commentary on your findings. Fuller analysis should be undertaken in Part 2. |                                  |                                 |   |
|--|--|----------------------------------|---------------------------------|---|
|  | High negative impact<br>EqIA   | Medium negative impact<br>Screen | Low negative impact<br>Evidence | High/Medium/Low Positive Impact<br>Evidence   |
| <b>Age</b>                                 |  |                                  |                                 | Yes. Positive: more Secondary aged pupils to benefit from an appropriate ASD placement.                                   |
| <b>Disability</b>                          |  |                                  |                                 | There will be more places available to meet the needs of children with ASD.   |
| <b>Sex</b>                                 |  |                                  |                                 | The School would remain co-educational  |
| <b>Gender identity/<br/>Transgender</b>    |  |                                  |                                 | The School will accept children placed by KCC regardless of gender identity.  |
| <b>Race</b>                                |  |                                  |                                 | The School will accept children placed by KCC regardless of race or ethnicity.  |
| <b>Religion and Belief</b>                 |  |                                  |                                 | The School will accept children placed by KCC regardless of their religious beliefs. The curriculum covers all religions. |
| <b>Sexual Orientation</b>                  |  |                                  |                                 | N/A   |
| <b>Pregnancy and<br/>Maternity</b>         |  |                                  |                                 | N/A   |
| <b>Marriage and Civil<br/>Partnerships</b> |  |                                  |                                 | N/A   |
| <b>Carer's<br/>Responsibilities</b>        |  |                                  |                                 | N/A   |

**Part 2****Equality Analysis /Impact Assessment****Protected groups**

No negative impact on protected groups is anticipated.

**Information and Data used to carry out your assessment**

The information and data used to carry out the assessment is taken from school census records and the County Council's Commissioning Plan for Education Provision in Kent 2020-24.

**Analysis of Equality Monitoring Factors:**

| Spring 2020                 | School*      |       | Tunbridge Wells |       | Kent * |       |
|-----------------------------|--------------|-------|-----------------|-------|--------|-------|
|                             | Number       | %     | Number          | %     | Number | %     |
| Free school meals           | 43           | 23.5% | 1731            | 9.1%  | 36045  | 15.1% |
| SEN - with EHCP             | 256          | 100%  | 656             | 3.4%  | 8710   | 3.7%  |
| Ethnic Minority             | 29           | 11.3% | 3696            | 19.3% | 52419  | 22.0% |
| English additional language | Fewer than 5 |       | 2064            | 10.8% | 27337  | 11.5% |

\* Data from Schools' Census Spring 2020

- 23.5% of Broomhill Bank pupils are eligible for free school meals, which is higher than the District average of 9.1% and the Kent average of 15.1%.
- All pupils at Broomhill Bank have EHCPs.
- The school has a lower percentage of ethnic minority pupils when compared to the District and County averages of 19.3% and 22% respectively.
- The vast majority of the Broomhill Bank pupils speak English as their first language; the school has a significantly lower percentage of pupils with English as an additional language when compared to the District and County averages; however, this is a common pattern with many of the Special Schools elsewhere in Kent.

**Pupils on Roll at Broomhill Bank - Schools' Census Spring 2020:**

| Year 14 | Year 13 | Year 12 | Year 11 | Year 10 | Year 9 | Year 8 | Year 7 | Year 6 | Total Statutory Roll | Total Roll |
|---------|---------|---------|---------|---------|--------|--------|--------|--------|----------------------|------------|
| 19      | 22      | 32      | 36      | 39      | 35     | 33     | 36     | 4      | 183                  | 256        |

### **Who have you involved, consulted and engaged?**

The consultation document will be distributed by the school to parents, members of staff and governors. The consultation will also be emailed to all key stakeholders, including but not limited to the following groups:

- The Department for Education
- The Diocese of Rochester, Canterbury and Southwark
- Elected Members (Kent County Council, District and Parish Councils)
- Local MP
- Trade Unions
- Local Children's Centres and pre-school providers
- Schools in Tunbridge Wells and Sevenoaks area
- Local Libraries in the Tunbridge Wells and Sevenoaks area

All stakeholders will be able to access the key documents on the School and KCC websites.

### **Analysis**

There is no evidence that the change will impact negatively on pupils from Protected Groups or lead to them being treated less favourably. The school will remain co-educational and continue to welcome pupils placed by KCC regardless of gender identity, race, ethnicity or religion beliefs.

### **Adverse Impact,**

No adverse impacts have been identified.

### **Positive Impact:**

The proposal to change of Designated Number at Broomhill Bank School will provide much needed ASD places in West Kent

### **JUDGEMENT**

- **No major change** - no potential for discrimination and all opportunities to promote equality have been taken

### **Internal Action Required**

None

**YES/NO**

**Equality Impact Analysis/Assessment Action Plan**

| Protected Characteristic | Issues identified | Action to be taken | Expected outcomes | Owner | Timescale | Cost implications |
|--------------------------|-------------------|--------------------|-------------------|-------|-----------|-------------------|
|                          |                   |                    |                   |       |           |                   |
|                          |                   |                    |                   |       |           |                   |
|                          |                   |                    |                   |       |           |                   |
|                          |                   |                    |                   |       |           |                   |

**Have the actions been included in your business/ service plan?**

Yes

Appendix

Please include relevant data sets

Please forward a final signed electronic copy and Word version to the Equality Team by emailing [diversityinfo@kent.gov.uk](mailto:diversityinfo@kent.gov.uk)

If the activity will be subject to a Cabinet decision, the EqIA must be submitted to committee services along with the relevant Cabinet report. Your EqIA should also be published.

The original signed hard copy and electronic copy should be kept with your team for audit purposes.