

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

Directorate/ Service: Children Young People and Education

Name of decision, policy, procedure, project or service: Commissioning Plan for Education Provision in Kent 2019-23

Responsible Owner/ Senior Officer: David Adams (AEO South)

Version: 1

Author:

Pathway of Equality Analysis: CYPECC

Summary and recommendations of equality analysis/impact assessment.

- **Context**

The Commission Plan for Education Provision in Kent is an annual publication that provides an overarching framework for determining when and where education provision may be needed in the future.

- **Aims and Objectives**

The aim of the Plan is to:

- Provide an overarching framework for determining when and where education provision may be needed in the future. To this end 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.
- Set 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.

- **Summary of equality impact**

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 protected groups and if so what action, if any, should be taken to amend the Plan or to mitigate the negative impacts. The second, a more detailed analysis of the impacts on any protected group arising from individual education consultation proposals.

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.

The EqIA 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.

Updated 21/11/2018

**Adverse Equality Impact Rating Low
Attestation**

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning The Commissioning Plan for Education Provision in Kent 2019-23. I agree with risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

Head of Service



Signed: _____

Name: David Adams

Job Title: Area Education Officer (South)

Date: 26-9-2018

DMT Member

Signed: _____

DMT Member



Signed: _____

Name: Keith Abbott

Job Title: Director Education, Planning and Access

Date: 26-9-2018

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?

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

2.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>High positive impact 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*. The needs of protected groups will be considered in any consultation through an EqIA specific to that consultation.</p> <p>These assumptions will be tested as part individual school consultation processes.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

**The most vulnerable learners in this context included those entitled to Pupil Premium funding, who are looked after or are classified as SEN.

2. Every child has access to a local good or outstanding school, which is appropriate to their needs.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

3. All education provision in Kent should be financially efficient and viable.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqlA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability				
Sex				
Gender identity/ Transgender				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.
Race				
Religion and Belief				
Sexual Orientation				We recognise that in areas of high surplus capacity actions taken to reduce surplus may impact on parental choice. Actions may also have an impact on disabled pupils or parents/carers if they have to incur the costs of travelling further for a school place. This may also impact on pupils with SEN who may have to travel further to access appropriate provision. The impact will need to be tested in the specific EqlA for an individual consultation.
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

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

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>The KCP identifies gaps in provision for Early Years through to Post 16 including provision for pupils classed as disabled due to their special educational needs.</p> <p>The views of parents and the local community will be captured and considered at every opportunity during a consultation. This will include capturing opinion by recording and transcribing public meetings, ensuring consultation information is spread widely in the consultation area and encouraging emailed as well as posted responses.</p> <p>We will ensure that all our consultations are made accessible, from the venues in which we hold meeting to the options provided for responding to a given consultation.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

5. We will aim to promote parental preference

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqlA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities.</p> <p>Responding parental preferences in respect of school choice and diversity means that provision will respond to a range of needs within a community. However, the Local Authority is mindful that the expansion of a popular school could make other schools in the area less viable. Particularly when a school is rated as Requires Improvement or Inadequate. These schools may well have a higher percentage of pupils from disadvantage families, pupils with SEND needs or who have English as an Additional Language. For each consultation a separate EqlA will be completed to assess and understand the equality implications and opportunities.</p> <p>Analysis of admissions data will be undertaken in districts where we do not achieve our preference targets to identify if any protected group disproportionately affected. If this is the case actions will be put in place to redress the situation.</p> <p>These assumptions will be tested as part individual</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

				school consultation processes.
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6. 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 to the community.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>Views within a consultation will be captured and considered at every opportunity. This will include capturing opinion by recording and transcribing public meetings, ensuring consultation information is spread widely in the consultation area and encouraging emailed as well as posted responses.</p> <p>We will ensure that all our consultations are made accessible, from the venues in which we hold meeting to the options provided for responding to a given consultation.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

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

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability				
Sex				
Gender identity/ Transgender				Positive for children with SEN and disabilities.
Race				Looked after children will be able to access educational provision across the County including Unaccompanied Asylum Seeking Children.
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				Consultation will seek to elicit views in relation to this priority.
Marriage and Civil Partnerships				These assumptions will be tested as part individual school consultation processes.
Carer's Responsibilities				

8. 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.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>KCC policy is to expand schools that are rated Good or Outstanding. These schools are reducing the gaps in achievement between the groups with protected characteristics and all other pupils.</p> <p>Therefore, this is a positive for children with SEN and disabilities and those from minority communities and/or from low income families.</p> <p>These assumptions will be tested through individual consultations.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

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

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>The impact on all groups particularly those with protected characteristics will be evaluated when resourcing decisions are made.</p> <p>We understand that the cheapest commissioning option may not always make the most efficient use of our resources. The use of resources must have a positive impact on protected groups.</p> <p>These assumptions will be tested through consultation.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

10. 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.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>Children have one opportunity to receive a good education. Acting to ensure they receive this and do not languish in inadequate provision is essential</p> <p>Statistically higher numbers of pupils in with English as an Additional Language (EAL), those who receive SEND support and disadvantaged pupils can be found in "Requires Improvement/Inadequate" schools then those that are "Good/Outstanding".</p> <p>If alternative provision is commissioned this could have a disproportionate impact on EAL, SEND and disadvantaged pupils in the short term.</p> <p>These assumptions will be tested through consultation.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

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

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>Children have one opportunity to receive a good education. Acting to ensure they receive this and do not languish in inadequate provision is essential</p> <p>Statistically higher numbers of pupils in with English as an Additional Language (EAL), those who receive SEND support and disadvantaged pupils can be found in "Requires Improvement/Inadequate" schools then those that are "Good/Outstanding".</p> <p>If alternative provision is commissioned this could have a disproportionate impact on EAL, SEND and Disadvantaged pupils in the short term.</p> <p>These assumptions will be tested through consultation.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

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

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability				
Sex				
Gender identity/ Transgender				Positive for all children.
Race				It can be reasonably assumed that lower income families will access social housing and therefore some or the most disadvantaged pupils will be resident in areas of high housing growth. Through the consultation process, we will review the education provision in the locality to ensure that it is accessible to all including the most disadvantaged pupils.
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				These assumptions will be tested through consultation.
Carer's Responsibilities				

13. In areas of high surplus capacity, we will take action to reduce such surplus.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqlA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>Areas of high surplus are spread around the county. The surplus can change significantly from one planning group to the next. We recognise that in areas of high surplus capacity actions taken to reduce surplus may impact on parental choice. Actions may also have an impact on disadvantaged families if they have to incur the costs of travelling further for a school place or pupils SEN pupils who may have to travel further to access appropriate provision.</p> <p>If the reduction of surplus numbers has to be considered via the reduction of Published Admissions Numbers or a school closure, a careful assessment of the impact on all protected characteristic groups will, be undertaken.</p> <p>Further equality impact assessments specific to those consultations will be undertaken at that point.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				
Marriage and Civil Partnerships				
Carer's Responsibilities				

14. 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.

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'. 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 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
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and				

Maternity				<p>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					
Carer's Responsibilities					

15. 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.
- 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 (primary through to secondary) where this is in the interests of the local community.

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority’s ‘Vision and Priorities for Improvement’.
Disability				
Sex				
Gender identity/ Transgender				Positive for all children.
Race				Overall positive for all children as the quality of provision is of primary concern.
Religion and Belief				
Sexual Orientation				The planning guideline may be more difficult to comply with by some groups, such as faith groups, hence the guidance is “will not normally” rather than “must”.
Pregnancy and Maternity				
Marriage and Civil Partnerships				Therefore, we will consider the merits of the individual proposal, against the broad range of principles and

Carer's Responsibilities				<p>guidelines, and our Public Sector Equality Duty will 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 the issues relating to sex/gender will need to be taken into account.</p>
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16. 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.
- We will aim to commission specialist provision in any new Primary or secondary school. This could either be through the inclusion of a Special Resourced Provision (SRP) or a satellite provision linked to a local special school.
- 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.

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.</p> <p>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 young people with disabilities. These assumptions will be tested as part individual school consultation processes.</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				

Marriage and Civil Partnerships				
Carer's Responsibilities				

17. 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.

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				Positive for all communities in Kent and supports the delivery of the Local Authority's 'Vision and Priorities for Improvement'.
Disability				
Sex				
Gender identity/ Transgender				Overall these guidelines are positive. Increasing access to high quality education provision benefits all and increases parental choice.
Race				
Religion and Belief				Any negative impact on neighbouring schools, and therefore children's education, would be considered as part of the evaluation of individual proposals.
Sexual Orientation				
Pregnancy and Maternity				This would include the impact on groups with protected characteristics.
Marriage and Civil Partnerships				
Carer's				These assumptions will be tested as part individual

Responsibilities				school consultation processes.
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Planning guidelines – Support of Small Schools

Kent County Council and its partners, in particular the dioceses, will ensure that:

- support is given to small schools seeking to collaborate, federate or join appropriate multi-academy trusts
- All relevant local authority plans, and policies explicitly address the needs of small schools;
- All services provided or brokered through the council take account of the needs of small schools in terms of the services offered and pricing;
- The allocation of revenue and capital funding takes into account the needs of small schools.
- They will work closely with both diocesan boards of education to ensure that the distinctive character and ethos of small church of England schools is protected and maintained in future collaborative arrangements.

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age				<p>There are 89 small school is Kent (those with less than 150 pupils. Kent County Council values small primary schools and recognises the contribution they make to the education of children in rural areas. KCC policy is to ensure small schools thrive and continue to play a valued role in their local communities.</p> <p>This is a positive impact for:</p> <p>For families with a Christian faith and a preference for Church of England Schools as 64% of our small schools being linked to either the Diocese of Canterbury or</p>
Disability				
Sex				
Gender identity/ Transgender				
Race				
Religion and Belief				
Sexual Orientation				
Pregnancy and Maternity				

Marriage and Civil Partnerships				Rochester.
Carer's Responsibilities				<p>For all families as our small schools accept pupils of any faith or no faith.</p> <p>Positive for all groups, as supporting our small schools to stay open will ensure that there is local provision for our rural communities. Thus, reducing the need to travel distances for primary education.</p>

The County Council's goals by 2021 are to ensure:

Goal	Equality Impact
There will be more good schools, with at least 95% of Primary and 96% of secondary schools judged as good or outstanding. 100% 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 92% of families secure school places at their first preference primary school, and 75% secure school places at their first preference secondary school. At least 95% secure either their first or second preference at both primary School and 85% at secondary school.	No particular negative equality impact is perceived. Analysis of admissions data will be undertaken in districts where we do not achieve our preference targets to identify if any protected group is disproportionately affected. If this is the case actions will be put in place to redress the situation.
There is 5% surplus capacity in schools across the County.	This is positive in that it provides spare places for groups such as Gypsy Roma and 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 are at least 5% surplus Year R places in each of the 12 districts in Kent.	This is positive in that it provides spare places for groups such as Gypsy Roma and 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 to 260.	Making appropriate local provision available is positive for children with special educational needs and will have a positive impact for the disability protected characteristic.

David Adams
Area Education Officer (South Kent)

Part 2

Equality Analysis /Impact Assessment

Protected groups

Not known at this point

Information and Data used to carry out your assessment

Pupil forecasts from Management Information.

Housing forecasts from District Core/Local plans or their variants

Who have you involved consulted and engaged?

District and borough councils, schools, KCC members and the wider public will have the opportunity to comment on the plan prior to the adoption of the KCP by KCC Cabinet committee in January 2019.

Analysis

To be commented on after the consultation period.

Adverse Impact,

Any Adverse impact will be commented on and mitigation put in place if required after the consultation.

Positive Impact:

The over-arching nature of the Commissioning Plan for Education Provision 2019-23 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.

Any identified positive impact will be commented on and mitigation put in place if required after the consultation.

JUDGEMENT

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

Internal Action Required

See action plan

YES

Equality Impact Analysis/Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
ALL	Although no adverse impacts have been identified, this is a strategic plan which will affect all children and young people in Kent as such it will need to be consulted on in order to ensure that any adverse impacts which may not have been identified by KCC are raised by protected groups	Consultation	No change	D Adams	Consultation complete by 15 December 2018	Any significant changes to the cost of implementing commission proposals will be brought to the attention of Cabinet

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

Yes