Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	Proposal to establish a new designated SEND unit for pupils with Sensory Impairment at Bower Park Academy.
Lead officer:	Pooneeta Mahadeo, School Organisation Manager, Learning and Achievement, Children Services.
Approved by:	Trevor Cook, Assistant Director of Education
Date completed:	21 December 2022
Scheduled date for review:	.January 2024

Did you seek advice from the Corporate Policy & Diversity team?	No
Did you seek advice from the Public Health team?	No
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality & Health Impact Assessment Checklist

About your activity

1	**Title of activity**	Proposal to establish a new designated SEND unit for pupils with Sensory Impairment at Bower Park Academy.
2	**Type of activity**	Project
3	**Scope of activity**	The Scope of the activity is to assess the impact of the proposal to implement a SEND unit at Bower Park Academy. The activity will also cover any decisions and processes required for the proposal to be effectively implemented whilst ensuring that it meets all the aims and priorities set out in the strategy.

4a	**Are you changing, introducing a new, or removing a service, policy, strategy or function?**	No		
4b	**Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?**	Yes	If the answer to <u>any</u> of these questions is **'YES'**, please continue to question **5**.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is **'NO'**, please go to question **6**.
4c	**Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?**	No		
5	**If you answered YES:**	**Please complete the EqHIA in Section 2 of this document.** Please see Appendix 1 for Guidance.		
6	**If you answered NO:**	*Please provide a clear and robust explanation on why your activity does not require an EqHIA. This is essential in case the activity is challenged under the Equality Act 2010.* *Please keep this checklist for your audit trail.*		

Completed by:	Pooneeta Mahadeo, School Organisation Manager, Learning and Achievement, Children Services
Date:	21 December 2022

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:
The London Borough of Havering's vision is for children and young people with Special Educational Needs and Disabilities (SEND), and other additional needs, to enjoy their education in the most inclusive environment possible and be supported in participating as fully as they can in the lives of their schools and local community, throughout childhood and into adulthood. The Council's High Needs Strategy 2017-22, sets out ambitious and realistic objectives to ensure Havering's provision is the first choice for children and young people with high needs and their families. It provides details of our local offer and the changes that will be implemented to ensure that the needs of children and young people with SEND are met. One of the key changes proposed in the Havering High Needs Strategy 2017-2022 is the delivery of an on-going programme to create more SEND units in mainstream settings. As at January 2022 there were 2016 children and young people resident in Havering with an Education, Health and Care Plan of SEND. As there is no secondary specialist provision for pupils with Sensory Impairments, in Havering, one is needed to ensure that young people with sensory impairment, hearing and or visual impairment can access the support they need to achieve their academic potential. The proposed SEND unit at Bower Park Academy will help meet the demand for SEND places.

Who will be affected by the activity?
- Children with an EHCP   - Parents/Carers of children with an EHCP   - Pupils who attend Bower Park Academy   - Parents/ Carers of pupils at Bower Park Academy   - Teachers and other staff at Bower Park Academy   - The governing body of Suttons Primary Schools   - Early Years Providers   - Other primary schools in the borough

Protected Characteristic - Age: Consider the full range of age groups		
Please tick (✓) the relevant box:		**Overall impact:** The proposed SEND unit at Bower Park Academy is part of the programme arising out of the Havering Strategy which seeks to ensure that all children have their special educational needs met as appropriately as possible irrespective of their age. This would impact positively on all children identified with Sensory Impairment.
Positive	✓	
Neutral		
Negative		

Evidence: As at January 2022 there were 2016 children and young people resident in Havering with an Education, Health and Care Plan of SEND, as recorded on the annual SEN2 return. The figure is an increase from 1869 a year earlier. In addition to the increasing numbers, we are also seeing an increase in children presenting more complex needs and as a consequence, being sent out of borough due to the lack of support and local provision. Currently, there are no SEND units in Havering that cater for children with Sensory Impairment needs at a secondary school level.

Sources used:

- SEN2 return
- Havering projections

Protected Characteristic - Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions		
Please tick (✓) the relevant box:		**Overall impact:** The overall impact is positive as the implementation of this new SEND unit will enable children with an EHCP of Sensory Impairment needs to access education within a local mainstream secondary school whilst receiving additional support required via the SEND unit.
Positive	✓	
Neutral		The SEND unit provision will be DDA compliant and will cater for the full range of conditions with an improved disability access, facilities and specially resourced areas that will provide the appropriate level of support needs.
Negative		The establishment of the SEND unit will help meet the demand for places from pupils with Sensory Impairment, therefore helping to better meet the needs of pupils who have SEND.

Evidence: As there is no secondary specialist provision for pupils with Sensory Impairments, in Havering, one is needed to ensure that young people with sensory impairment, hearing and or visual impairment can access the support they need to achieve their academic potential.

Sources used:

Protected Characteristic - Sex/gender: Consider both men and women		
Please tick (✓) the relevant box:		**Overall impact:** Overall, the implementation of this SEND unit will impact equally upon all the children with sensory impairment, although trend shows that almost three – quarters of children with SEND in secondary schools are male.
Positive	✓	
Neutral		
Negative		
Evidence: 120 girls and 280 boys attending a Havering secondary school are identified as having an Education and Health Care Plan (EHCP)		
Sources used: • Jan 2022 School Census		

Protected Characteristic - Ethnicity/race: Consider the impact on different ethnic groups and nationalities		
Please tick (✓) the relevant box:		**Overall impact:** The implementation of this SEND unit will impact positively on all children with sensory impairment needs, their parents and carers in line with the proportion of their ethnic group in the population as a whole.
Positive	✓	
Neutral		
Negative		
Evidence: The growing number of Asian/Black/Mixed pupils holding statements reflects the changing ethnic diversity of the Borough. The number of Asian/Black or Black British children receiving SEN support is increasing but the proportion is still low in comparison to pupils in mixed or white British ethnic groups. This may be a cultural artefact whereby Asian/ Black families are less willing to have their children 'labelled' as having special educational needs. Interestingly, Black or Black British children who have been identified as having special educational needs are more likely to have been issued a Statement historically. The data showing the awarding of an Education, Health and care Plan shows no significant difference so far.		
Sources used: • Havering Data Intelligence Hub - Special Educational Needs and Disability (SEND) Needs Assessment –Deep dive for 2016/17. • School census		

Protected Characteristic - Religion/faith: Consider people from different religions or beliefs including those with no religion or belief		
Please tick (✓) the relevant box:		**Overall impact:** The overall impact is neutral because the special educational needs of all pupils will be met irrespective of their religious beliefs or none.
Positive		
Neutral	✓	
Negative		

Evidence: As there is no secondary specialist provision for pupils with Sensory Impairments, in Havering, one is needed to ensure that young people with sensory impairment, hearing and or visual impairment can access the support they need to achieve their academic potential.	
Sources used: • Havering High Needs Strategy 2017-2022	

Protected Characteristic - Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓) the relevant box:		**Overall impact:** The overall impact is neutral because the special education needs of all pupils will be met irrespective of their sexual orientation.
Positive		
Neutral	✓	
Negative		
Evidence:		
Sources used:		

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

Please tick (✓) the relevant box:		**Overall impact:** The overall impact is neutral because the special educational needs of all pupils will be met irrespective of their previous or current gender identity.
Positive		
Neutral	✓	
Negative		
Evidence:		
Sources used:		

Protected Characteristic - Marriage/civil partnership: Consider people in a marriage or civil partnership

Please tick (✓) the relevant box:		**Overall impact:** The overall impact is neutral.
Positive		
Neutral	✓	
Negative		
Evidence:		
Sources used:		

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave		
Please tick (✓) the relevant box:		**Overall impact:** The overall impact is neutral.
Positive		
Neutral	✓	
Negative		
Evidence:		
Sources used:		

Socio-economic status: Consider those who are from low income or financially excluded backgrounds		
Please tick (✓) the relevant box:		**Overall impact:** The overall impact is positive for children who are from a low income or financially excluded backgrounds.
Positive	✓	
Neutral		We currently have a 30 place SEND Unit for primary pupils with Hearing Impairment at Hacton Primary School, however there is no secondary SEND Unit for such pupils to transition into for Secondary Education. A number of pupils are being sent to out-borough provision which is problematic for families and costly for the authority due to lack of specialist secondary provision for pupils with Sensory Impairment.
Negative		
Evidence: A report published by Joseph Rowntree Foundation states that poverty is both a cause and an effect of SEND and makes a series of recommendations, including the need to prioritise SEND by policy makers, schools and early years leaders. 1 in 5 children in Havering live in poverty and the prevalence of SEND is highest in those areas with the highest levels of deprivation when compared with the more affluent areas.		
Sources used: • Havering Data Intelligence Hub- Special Educational Needs and Disability (SEND) Needs Assessment –Deep dive for 2016/17		

Health & Wellbeing Impact: Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity? Please use the Health and Wellbeing Impact Tool in Appendix 2 to help you answer this question.	
Please tick (✓) all the relevant boxes that apply:	**Overall impact:** The overall impact on health and wellbeing is positive, particularly for SEND pupils living in the borough.

Positive	✓	
Neutral		**Do you consider that a more in-depth HIA is required as a result of this brief assessment?** Please tick (✓) the relevant box
Negative		Yes ☐ No ☑

Evidence:

In Havering we are committed to developing the most inclusive communities which are welcoming and supportive of all. Our aspiration for all our children and young people are the same and this is that they should all have the best opportunities to achieve and fulfil their potential. Our aim for children and young people with special educational needs (SEN) is even more ambitious in that we want them to enjoy their education in the most inclusive environment possible and be supported in participating as fully as they can in the lives of their schools and local community. The local specialist provisions will ensure that all children can have their needs met in a school as close to home possible. This is to ensure that they are in the right school at the right time so that they may participate fully in the lives of their schools and make the most of their learning opportunities. The implementation of specialist SEND provision will support schools and families to help children and young people remain and develop into participative members of their local schools and community.

Sources used:
- The Havering High Needs Strategy 2017-2022

3. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

	1. The EqHIA identified <u>no significant concerns</u> OR the identified <u>negative concerns</u> have already been <u>addressed</u>	→	**Proceed with implementation** of your activity
	2. The EqHIA identified some <u>negative impact</u> which still needs <u>to be addressed</u>	→	**COMPLETE SECTION 4:** **Complete action plan** and finalise the EqHIA
	3. The EqHIA identified some <u>major concerns</u> and showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level	→	**Stop and remove** the activity or **revise** the activity **thoroughly.** **Complete an EqHIA on the revised proposal.**

4. Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise negative impacts and enhance/optimise positive impacts. In this section you should list the specific actions that set out how you will address any negative equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
The EqHIA indicates that the impact of this activity overall will be effectively neutral on some of the protected characteristics because the special educational needs of all pupils will be met. The proposal will have a positive impact on parents' mental health and wellbeing because the implementation of the SEND unit will mean the addition of places in a local provision that meets the needs of their children with SEND. Health and wellbeing will also be promoted, as individual support will be provided in a tailored way to cater for pupils with complex needs to help them learn and enjoy their education in the most inclusive environment possible.	None	None	Monitoring will occur through the Children and Adult Disabilities' (CAD) team who oversee the management of the SEND units/additional resourced provision to ensure that the models, funding and styles of operation continues to meet the needs of all children with complex needs and that support is in place to intervene as early as possible	September 2024 – September 2025	Caroline Penfold /Lisa Harvey

5. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review: Annually

Scheduled date of review: January 2024

Lead Officer conducting the review: Pooneeta Mahadeo

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

Appendix 2. Health & Wellbeing Impact Tool

Will the activity/service/policy/procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES ☐ NO ☐	Personal circumstances YES ☒ NO ☐	Access to services/facilities/amenities YES ☒ NO ☐
☐ Diet	☐ Structure and cohesion of family unit	☐ to Employment opportunities
☐ Exercise and physical activity	☐ Parenting	☐ to Workplaces
☐ Smoking	☒ Childhood development	☐ to Housing
☐ Exposure to passive smoking	☒ Life skills	☐ to Shops (to supply basic needs)
☐ Alcohol intake	☐ Personal safety	☐ to Community facilities
☐ Dependency on prescription drugs	☐ Employment status	☐ to Public transport
☐ Illicit drug and substance use	☐ Working conditions	☒ to Education
☐ Risky Sexual behaviour	☐ Level of income, including benefits	☐ to Training and skills development
☐ Other health-related behaviours, such as tooth-brushing, bathing, and wound care	☐ Level of disposable income	☐ to Healthcare
	☐ Housing tenure	☐ to Social services
	☐ Housing conditions	☐ to Childcare
	☒ Educational attainment	☐ to Respite care
	☐ Skills levels including literacy and numeracy	☐ to Leisure and recreation services and facilities

Social Factors YES ☐ NO ☐	Economic Factors YES ☒ NO ☐	Environmental Factors YES ☐ NO ☐
☐ Social contact	☐ Creation of wealth	☐ Air quality
☐ Social support	☐ Distribution of wealth	☐ Water quality
☐ Neighbourliness	☐ Retention of wealth in local area/economy	☐ Soil quality/Level of contamination/Odour
☐ Participation in the community	☐ Distribution of income	☐ Noise levels
☐ Membership of community groups	☐ Business activity	☐ Vibration
☐ Reputation of community/area	☐ Job creation	☐ Hazards
☐ Participation in public affairs	☐ Availability of employment opportunities	☐ Land use
☐ Level of crime and disorder	☐ Quality of employment opportunities	☐ Natural habitats
☐ Fear of crime and disorder	☒ Availability of education opportunities	☐ Biodiversity
☐ Level of antisocial behaviour	☒ Quality of education opportunities	☐ Landscape, including green and open spaces
☐ Fear of antisocial behaviour	☐ Availability of training and skills development opportunities	☐ Townscape, including civic areas and public realm
☐ Discrimination	☐ Quality of training and skills development opportunities	☐ Use/consumption of natural resources
☐ Fear of discrimination	☐ Technological development	☐ Energy use: CO2/other greenhouse gas emissions
☐ Public safety measures	☐ Amount of traffic congestion	☐ Solid waste management
☐ Road safety measures		☐ Public transport infrastructure