

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Children's Services
Service Area	Education
Service/policy/function being assessed	Proposed closure of Broadwater Primary School
Which borough (s) does the service/policy apply to	Wandsworth
Staff involved in developing this EINA	Adam Wells
Date approved by Directorate Equality Group (if applicable)	TBC
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	TBC (December 2022)
Date submitted to Directors' Board	TBC

1. Summary

After careful consideration, Wandsworth Council has made the difficult decision to consult on a proposal to close Broadwater Primary School in the Summer Term of 2023, with the intention to repurpose the site for Special Needs School provision. If the expansion of Paddock Special School on the site is approved, this will provide approximately 190 places to local pupils with complex special needs to meet increasing demand in the borough.

This proposal is driven by our collective aspirations for children with SEND to have their needs met locally, keeping them close to their families and friends and the need to retain a sustainable school system.

Due to the increase in demand for specialist places there is no longer sufficient capacity within our own existing special school provision, and we are having to commission places outside of Wandsworth, often in independent schools. Currently therefore, many of our young people with SEND have to travel long distances to attend schools away from their communities. This comes not only at a financial cost but also, more significantly, to children themselves, their families, and our local schools.

This need for additional specialist SEND provision has coincided with falling pupil numbers in mainstream primary schools across London, including in Wandsworth. This has been caused by families leaving the city as a consequence of Brexit and the pandemic and has resulted in a surplus of primary school places.

To address these two issues, we have been required to take decisive action and think creatively to both secure additional necessary specialist SEND capacity, as well as reducing surplus school places in the primary sector. This proposal for the repurposing of

the Broadwater school site is able to address both of these aims and it is important for the council to be very clear that it is for these reasons alone that this proposal was developed, and it is no reflection on the quality of teaching, or the staff and leadership of the school.

We are committed, through this consultation stage, to listening to and act on the views and concerns of those affected, and to providing the details and reassurance to mitigate the risk of any future changes. We understand that this proposal will inevitably impact on the children, parents and teachers of the Broadwater school community but also acknowledge that no proposals will ever have universal support. These difficult decisions have been taken in the wider interest of all children and families in Wandsworth.

This EINA has found that the proposed closure of the school would affect current pupils at the school. As BME pupils and pupils with EAL are overrepresented compared to the 2011 ward census profile in the pupil population this could potentially negatively affect BME pupils. The proportion of pupils in receipt of FSM at Broadwater is higher than the borough average. IDACI data also indicates that those families in the three most sensitive bands are over-represented in the school population. Therefore, the proposal could potentially negatively affect these vulnerable groups of children.

To mitigate against the impact on local applicants, the council has also assured itself that there are sufficient places in the local area for current pupils and future projected pupil numbers. The proposal is also linked to a proposal to repurpose the school site to secure additional necessary specialist SEND capacity which would have a positive impact for pupils with SEND.

This EINA has been updated following the findings of the pre-publication consultation. Additional information has been added about Pupils in receipt of free school meals and Income deprivation affecting children index (IDACI) data as an indicator of deprivation and also pupils who have English as an additional language.

The proposals are subject to further statutory consultation and this EINA will be updated with any additional findings from this.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Age data	School census October 2022. Council Admissions data
Disability	School census May 2022. Council SEND data
Sex	School census May 2022

Race/ethnicity	School census January 2022. National census 2011 data (via Data Wand)
Religion and belief	National census 2011 data (via Data Wand)
Deprivation	School census January 2022
Looked after children and children known to Social Care	School census October 2022

b. Who have you engaged and consulted with as part of your assessment?

The proposal will be subject to two consultations: a pre-publication consultation and further 4-week period following publication of statutory proposals. This EINA has been updated following comments received as part of the initial consultation.

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected group	Findings
Age	<p>The school provides places for young people aged 3 to 11.</p> <p>As of 4 December 2022, the school has 108 children in Years Reception to 5 who would be impacted by the closure of Broadwater Primary School at the end of 22/23 academic year.</p> <p>Further, preparatory work suggests sufficiency of places in local schools with 253 vacancies in the 0-1 mile home to school distance and 591 vacancies in the 0-1.5 miles home to school distance across the Rec – Yr 5 age range.</p>
Disability	<p>6 (4%) children at Broadwater have an EHCP and 1 child is under assessment. 4 of the 6 children with EHCPs have siblings, which we will consider in our admissions planning. School preferences have already been discussed with these families and these spread a range of schools. Only 1 parent is requesting a school which is not their nearest and so the changes will have minimal impact on transportation.</p> <p>According to May 2022 school census, in addition, 14% of pupils at the school receive SEN support. The proportion of pupils with an EHCP or receiving SEN support is similar to the profile for all primary schools in Wandsworth which were 4% and 14 % respectively in May.</p>
Sex	<p>According to the May 2022 schools census the current profile of the school is 52% female and 48% male. This compares to the borough average for female pupils in primary schools which is 50% and male 50%.</p>

Gender reassignment	N/A																																																	
Marriage and civil partnership	N/A																																																	
Pregnancy and maternity	N/A																																																	
Race/ethnicity	<p>In January 2022, the ethnic breakdown of pupils at Broadwater Primary School and all Wandsworth Primary Maintained schools and academies was as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Broadwater</th> <th>All primary schools</th> </tr> </thead> <tbody> <tr> <td>Asian or Asian British</td> <td>38%</td> <td>16%</td> </tr> <tr> <td>Black or Black British</td> <td>15%</td> <td>17%</td> </tr> <tr> <td>Mixed</td> <td>12%</td> <td>15%</td> </tr> <tr> <td>White</td> <td>24%</td> <td>45%</td> </tr> <tr> <td>Other</td> <td>6%</td> <td>5%</td> </tr> </tbody> </table> <p>This compares to ethnic breakdown of the Tooting Broadway Ward (where the school is located) and Wandsworth Borough according to the 2011 National Census as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Tooting Broadway Ward</th> <th>Wandsworth Borough</th> </tr> </thead> <tbody> <tr> <td>Asian or Asian British</td> <td>25%</td> <td>11%</td> </tr> <tr> <td>Black or Black British</td> <td>15%</td> <td>11%</td> </tr> <tr> <td>Mixed</td> <td>5%</td> <td>5%</td> </tr> <tr> <td>White</td> <td>51%</td> <td>71%</td> </tr> <tr> <td>Other</td> <td>3%</td> <td>2%</td> </tr> </tbody> </table> <p>In January 2022, the proportion of pupils for whom families identified English as an additional language (EAL) at Broadwater Primary School and all Wandsworth Primary Maintained schools was as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Broadwater</th> <th>All primary school</th> </tr> </thead> <tbody> <tr> <td>EAL</td> <td>57%</td> <td>41%</td> </tr> </tbody> </table> <p>This compares to the proportion of the population who identify EAL in the Tooting Broadway Ward (where the school is located) and Wandsworth Borough according to the 2011 National Census as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Tooting Broadway Ward</th> <th>Wandsworth Borough</th> </tr> </thead> <tbody> <tr> <td>EAL</td> <td>29%</td> <td>17%</td> </tr> </tbody> </table>			Broadwater	All primary schools	Asian or Asian British	38%	16%	Black or Black British	15%	17%	Mixed	12%	15%	White	24%	45%	Other	6%	5%		Tooting Broadway Ward	Wandsworth Borough	Asian or Asian British	25%	11%	Black or Black British	15%	11%	Mixed	5%	5%	White	51%	71%	Other	3%	2%		Broadwater	All primary school	EAL	57%	41%		Tooting Broadway Ward	Wandsworth Borough	EAL	29%	17%
	Broadwater	All primary schools																																																
Asian or Asian British	38%	16%																																																
Black or Black British	15%	17%																																																
Mixed	12%	15%																																																
White	24%	45%																																																
Other	6%	5%																																																
	Tooting Broadway Ward	Wandsworth Borough																																																
Asian or Asian British	25%	11%																																																
Black or Black British	15%	11%																																																
Mixed	5%	5%																																																
White	51%	71%																																																
Other	3%	2%																																																
	Broadwater	All primary school																																																
EAL	57%	41%																																																
	Tooting Broadway Ward	Wandsworth Borough																																																
EAL	29%	17%																																																

Religion and belief, including non-belief	<p>This data is not collected in the schools' census.</p> <p>Broadwater school is a non-denominational community primary school. School places are allocated using the Council's published admissions criteria for community schools without reference to faith or religion.</p> <p>This data is not collected in the schools' census. However, the 2011 Census found that 42% of residents in the Tooting Broadway Ward were Christian, 17% Muslim, 7% Hindu and 25% no religion.</p>																														
Deprivation	<p>In January 2022, the number and proportion of pupils at Broadwater Primary School and all Wandsworth Primary Maintained Schools in receipt of free school meals (FSM) was as follows:</p> <table border="1" data-bbox="459 757 1375 837"> <thead> <tr> <th></th> <th>Broadwater</th> <th>All primary schools</th> </tr> </thead> <tbody> <tr> <td>Eligible for FSM</td> <td>21 (44%)</td> <td>4918 (26%)</td> </tr> </tbody> </table> <p>The Council also uses Income Deprivation Affecting Children index (IDACI) data as indicator of deprivation affecting children in school. This is shown as an average score and also broken down by bands (1A being the most deprived). From the January 2022 census, the average score and proportion of pupils in each band at Broadwater Primary School and all Wandsworth Primary Maintained was as follows:</p> <table border="1" data-bbox="459 1189 1375 1512"> <thead> <tr> <th></th> <th>Broadwater</th> <th>All primary schools</th> </tr> </thead> <tbody> <tr> <td>Average IDACI Score</td> <td>0.20</td> <td>0.18</td> </tr> <tr> <td>IDACI Band 1a %</td> <td>10%</td> <td>14%</td> </tr> <tr> <td>IDACI Band 1b %</td> <td>17%</td> <td>11%</td> </tr> <tr> <td>IDACI Band 2 %</td> <td>38%</td> <td>24%</td> </tr> <tr> <td>IDACI Band 3 %</td> <td>19%</td> <td>21%</td> </tr> <tr> <td>IDACI Band 4 %</td> <td>15%</td> <td>15%</td> </tr> <tr> <td>IDACI Band 5 %</td> <td>2%</td> <td>16%</td> </tr> </tbody> </table>		Broadwater	All primary schools	Eligible for FSM	21 (44%)	4918 (26%)		Broadwater	All primary schools	Average IDACI Score	0.20	0.18	IDACI Band 1a %	10%	14%	IDACI Band 1b %	17%	11%	IDACI Band 2 %	38%	24%	IDACI Band 3 %	19%	21%	IDACI Band 4 %	15%	15%	IDACI Band 5 %	2%	16%
	Broadwater	All primary schools																													
Eligible for FSM	21 (44%)	4918 (26%)																													
	Broadwater	All primary schools																													
Average IDACI Score	0.20	0.18																													
IDACI Band 1a %	10%	14%																													
IDACI Band 1b %	17%	11%																													
IDACI Band 2 %	38%	24%																													
IDACI Band 3 %	19%	21%																													
IDACI Band 4 %	15%	15%																													
IDACI Band 5 %	2%	16%																													
Looked after children and children known to Social Care	<p>There are currently no Looked after children registered at Broadwater Primary School.</p> <p>In October 2022, the number and proportion of pupils at Broadwater Primary School and all Wandsworth Primary Maintained Schools in known to Social Care was as follows:</p> <table border="1" data-bbox="459 1845 1375 1926"> <thead> <tr> <th></th> <th>Broadwater</th> <th>All primary schools</th> </tr> </thead> <tbody> <tr> <td>Known to Social Care</td> <td>9 (5%)</td> <td>288 (2%)</td> </tr> </tbody> </table>		Broadwater	All primary schools	Known to Social Care	9 (5%)	288 (2%)																								
	Broadwater	All primary schools																													
Known to Social Care	9 (5%)	288 (2%)																													
Sexual orientation	N/A																														

Across groups i.e. older LGBT service users or Black, Asian & Minority Ethnic young men.	N/A
---	------------

Data gaps

Data gap(s)	How will this be addressed?
N/A	N/A

4. Impact

Protected group	Positive	Negative
Age	<p>In line with the national School Admissions Code, school places are allocated using published admissions criteria. The proposed changes relate to children and young people of primary statutory school age. Admissions to schools are a function that operates within a statutory framework. Wandsworth is the admission authority for community schools and there are arrangements and criteria for the admission of pupils to nursery, primary mainstream schools.</p> <p>There are sufficient places in good local school across the year groups to accommodate the Broadwater cohort within 1 mile of their home subject to parental preference. Currently, only 19% of the Broadwater cohort live within 1km of the school.</p>	<p>Any school closure resulting in the need for a child to change school will be disruptive to their education. However, to mitigate this impact we will work with staff on a transition plan for children as they move to a new school and think about the positive learning opportunities.</p> <p>The closure may affect siblings of pupils attending Broadwater if they intended to attend the same school. The Council would ensure that appropriate provisions are in place for any displaced pupils. They would ensure that parental preference and family circumstances such as siblings are considered when offering school places to minimise the impact on families wherever possible.</p> <p>To mitigate against the impact on local applicants, the council has also assured itself that there are sufficient places in the local area for current pupils and future projected pupil numbers.</p>

		<p>Parents would also have a right of appeal to an independent appeal panel.</p> <p>The proposals are subject to statutory consultation.</p>
Disability	<p>Children and young people with special educational needs and/or disability are given priority in the admissions criteria or attend specialist provision. The process for securing educational provision for children with an EHCP is managed through the Special educational needs assessment service and all schools are required to admit a child if the EHCP names them.</p> <p>The proposal is also linked to a proposal to repurpose the school site to secure additional necessary specialist SEND capacity which would have a positive impact for pupils with SEND.</p>	<p>6 children at Broadwater have an EHCP and 1 is under assessment. 4 of the 6 have siblings which we will consider in our planning. School preferences have already been discussed with these families and these spread a range of schools. Only 1 parent is requesting a school which is not their nearest and so the changes will have minimal impact on transportation.</p> <p>14% of the current Broadwater cohort at SEN support. To ensure that good transition planning was in place, the LA Inclusion team could facilitate a handover meeting for the current SENCo to share profiles with receiving schools.</p>
Sex	<p>As above, children are allocated school places in line with Admissions Code. The proposed changes are not sex specific. Places are allocated without reference to sex.</p>	None identified
Gender reassignment	n/a	
Marriage and civil partnership	n/a	
Pregnancy and maternity	n/a	
Race/ethnicity	<p>The admission criteria, in accordance with the national Admissions Code and equalities legislation, are used to allocate school places without reference to ethnicity or race.</p>	<p>The proposed closure of the school would affect current pupils at the school. As BME pupils and pupils with EAL are overrepresented in the pupil population this could potentially negatively affect BME pupils and pupils with EAL.</p>

		<p>To mitigate against the impact on local applicants, the council has also assured itself that there are sufficient places in the local area for current pupils and future projected pupil numbers. There are sufficient places in good local school across the year groups to accommodate the Broadwater cohort within 1 mile of their home subject to parental preference. Currently, only 19% of the Broadwater cohort live within 1km of the school.</p> <p>Parents would also have a right of appeal to an independent appeal panel.</p> <p>The proposals are subject to statutory consultation.</p>
<p>Religion and belief, including non-belief</p>	<p>This closure would not result in a decrease in the number of faith schools in the area.</p> <p>There are sufficient places in non-denomination schools and there are also a number of faith schools in the area for families seeking such places.</p>	
<p>Deprivation</p>	<p>The admission criteria, in accordance with the national Admissions Code and equalities legislation, are used to allocate school places without reference to the income or relative deprivation of families.</p>	<p>The proposed closure of the school would affect current pupils at the school. The proportion of pupils in receipt of FSM at Broadwater is higher than the borough average. IDACI data also indicates that those families in the three most deprived bands are over-represented in the school population. Therefore, the proposal could potentially negatively affect these vulnerable groups of children.</p> <p>To mitigate against the impact on local applicants, the council has</p>

		<p>also assured itself that there are sufficient places in the local area for current pupils and future projected pupil numbers. There are sufficient places in good local school across the year groups to accommodate the Broadwater cohort within 1 mile of their home subject to parental preference. Parents would also have a right of appeal to an independent appeal panel in the event that it is not possible to offer a preferred school.</p> <p>The proposals are subject to statutory consultation.</p>
<p>Looked after children and children known to Social Care</p>	<p>The admission criteria, in accordance with the national Admissions Code and equalities legislation, are used to allocate school places without reference to the relative need of families except where there is a need to attend a particular school rather than any other.</p>	<p>The proposed closure of the school would affect current pupils at the school. The proportion of pupils known to Social Care at Broadwater is higher than the borough average. This can include children in need and children under a Child protection Plan. Therefore, the proposal could potentially negatively affect these vulnerable groups of children.</p> <p>To mitigate against this, targeted support will be made available through the Council’s Social care teams.</p> <p>The council has also assured itself that there are sufficient places in the local area for current pupils and future projected pupil numbers. There are sufficient places in good local school across the year groups to accommodate the Broadwater cohort within 1 mile of their home subject to parental preference. Parents would also have a right of appeal to an independent appeal panel in the event that it is not</p>

		possible to offer a preferred school. The proposals are subject to statutory consultation.
Sexual orientation	N/A	

5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Work with the SENCO to consider school preferences and secure placement for children with an EHCP.	Deborah Johnson	July 23

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
4-week statutory representations ('formal consultation') - if the Council decides to proceed following pre-publication consultation	January 2023