

Equality Impact Assessment / Equality Analysis

Item name	Details
Special school with 2 small, collocated residential children's homes	A new special school offering 30-day placements for young people with an Education, Health and Care Plan aged 11-18 and 2, 4-bed residential children's homes, within the same building complex but entirely separate from the school. These two provisions will meet the needs of our most complex of young people with a likely diagnosis of Autism and linked Social, Emotional and Mental Health (SEMH).
Name of directorate and service	Education and Safeguarding
Name and role of officers completing the EIA	Olwyn Donnelly– Head of Education Commissioning

Date of assessment	7 th October 2025
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Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The school will be run by a Trust and the homes by a single provider, both of whom, will be appointed through a tender and interview process.</p> <p>The LA, Trust, Residential Provider, Ofsted and DfE will work closely together on the news school and children’s homes.</p> <p>The intended outcomes:</p> <ul style="list-style-type: none"> ● To reduce the number of young people placed in out of county placements

	<ul style="list-style-type: none"> To improve life outcomes for the young people by placing them closure to home with access to their local community, families and local employment opportunities To reduce costs in-line with the Safety Valve project
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> Is it a new service/policy or review of an existing one? Is it a national requirement?). How much room for review is there? 	<p>The new school and children’s homes are needed to increase the sufficiency of educational and residential places in B&NES for young people with an Education, Health and Care Plan (EHCP) at Secondary and 6th form age.</p> <p>These are the most complex young people who are currently funded to attend independent special schools due to the fact there are no suitable places in the local area.</p> <p>The provisions will be Ofsted inspected under their respective regulatory frameworks and each young person will have an annual review of their EHCP</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	No

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	School and residential staff will receive equalities training – this is mandatory
<p>2.2 What is the equalities profile of service users?</p>	The service users are the young people who will attend the school, those living in the children’s homes and their families who support them. These are diverse young people with high SEND needs mainly in the areas of Autism and SEMH

<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>The gaps in provision for this cohort was identified through a review of the Joint Agency pool which was carried out by an external consultant. One of the recommendations from this review was for B&NES to have SEND residential provision within area. <i>“More Autism and SEMH service provision is urgently needed to meet demand and to curb the escalation of need of CYP and their families, and referrals to specialist services. Consider the business case for a specialist residential school in B&NES and its impact on CYP outcomes and on placement costs”</i>.</p>
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The proposal is for the children’s homes and day school to be located in a closed Care Home (Charlton House) in Keynsham. A full public consultation was held on the closure of the care home with the remit of opening the school. Adult Social Care lead the consultation process. The following is the link to the outcome of the consultation: https://democracy.bathnes.gov.uk/documents/s80420/E3513%20-%20Appendix%201%20-%20Community%20Resource%20Centres%20Consultation%20Report.pdf At the point of this consultation, it was thought that the residential provision would offer up to 12 places and be run as a residential school. It has subsequently been identified that the designation should change to ‘children’s home’ as the CYP will be under the care of B&NES Council and the accommodation should be split into 2 smaller, 4-bed residential homes as this would provide a more homely environment.</p>
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>There will be a full consultation at the planning stage of the development which will clarify the change in designation from ‘residential school’ to ‘children’s homes’ but the cohort of CYP we would anticipate living there remains the same.</p> <p>The school and residential facility by nature has to be limited to the type of needs of the pupils that will be catered for. There will be no barriers within that cohort in relation to equal opportunities for a place in the school/residential facility</p>

3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.

- Could have a negative or adverse impact for any of the equalities groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Once the provision is open it will be limited to the cohort of young people within the age range of 11-17 with an EHCP and complex needs (based around Autism & SEMH). Within that group there will be no issues in relation to protected characteristics	The group of young people in the provision will be determined by their need. Within SEN there is a legal requirement to consult for places within a school and this process will need to be followed. The LA would expect “reasonable adjustments” based on person centred planning through the EHCP to be made to accommodate the young people within the consultation process.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	In the 2 children’s homes each will have 4 individual bedrooms with en-suite bathrooms. Children and young people will be carefully matched according to need and compatibility with the other CYP before placement is considered rather than sex.	There is no known impact based on sex. Children will have their individual bedrooms and the make up of each home will consider the sex of the children and young people alongside other compatibility factors
3.3 Pregnancy and maternity	This would not be a barrier to a day placement at the school if the young person’s needs met the criteria for the provision	Theoretically young people over the age of 16 could get pregnant although safeguarding protocol would be in place within the school and children’s home aimed to educate and prevent unplanned pregnancies. Each pregnancy would be considered on a case by case process
3.4 Gender reassignment – identify the	This would not be a barrier to a placement at the school or home if the young person’s needs met the criteria for the provision.	Transgender and non-binary people may face challenges residing in children’s homes.

<p>impact/potential impact of the policy on transgender people</p>	<p>The children’s homes will provide an inclusive environment: Support for transgender and non-binary residents will include the use of preferred names and pronouns.</p> <p>There will be support and access to services for service users and staff for any - support needs based on gender identification for example Off the Record, SARI. For any equality incidents based on gender identity, whether intentional or not, we will engage relevant services to educate and support both the instigator and victim – Off the record, SARI</p>	<p>Consideration needs to be given to the services and support that individuals receive. Consideration would be given to the mental health needs of YP who are questioning their gender identity.</p> <p>This would be considered on an individual needs process. Support will be in place to ensure access to health services based on individual needs including:</p> <ul style="list-style-type: none"> • facilitating access to appropriate care. • Become knowledgeable about the possible health care needs of transgender and non-binary people in general. • exhibit respect for CYP with non-conforming gender identities • seek patients’ informed consent before providing treatment and involve them in decision-making.
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p>	<p>Young people within the specified age range will be accommodated in the provision with no barriers to disability – physical, sensory and mental health difficulties, etc. so long as there overarching needs meet the remit of the school and residential provision</p>	<p>Barriers to disability will be that the requirements of the provision are not in-line with the needs of the young person. As above there are legal processes which will be followed in relation to the consultation process for placements in the provisions</p>

<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>By definition the provision is only open to those aged 11 -18</p>	<p>There are no mitigations to this</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>Young people within the specified age range will be accommodated in the provision with no barriers to race.</p> <p>The school will be encouraged to sign up to the B&NES Race Equality Charter Mark: https://beta.bathnes.gov.uk/race-equality-charter-schools</p>	<p>For any incidents of racism whether intentional or not we will engage relevant services to educate and support both the instigator and victim for example SARI, Black Families Education Service.</p> <p>Individual EHCP's will determine cultural needs, including skin and hair hygiene, dietary requirements and access to culturally appropriate resources. Positive inclusive practice will promote and respect the ethnic identity of all individuals.</p> <p>Ongoing training will be provided for all staff.</p>
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>	<p>This would not be a barrier to a placement at the school or homes if the young person's needs met the criteria for the provision</p>	<p>For any equality incidents based on sexual orientation whether intentional or not we will engage relevant services to educate and support both the instigator and victim – Off the record</p> <p>Individual EHCP's may determine sexual orientation. Positive inclusive practice will promote and respect the sexual orientation of all individuals.</p> <p>Research informs that neurodivergent people, including Autistic CYP are more likely to identify as LGBTQ+ https://nhsdorset.nhs.uk/neurodiversity/living/lgbtq/</p> <p>Individual needs would be considered on a case by case process.</p>

<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>Marriage and civil partnership would be treated equally. If a young person at 16+ was in either a marriage or civil partnership this would not be a barrier to a day placement at the school if the young person's needs met the criteria for the provision</p>	<p>There could be a negative impact on the arrangements in the children's homes which would need to be managed according to national guidance and provider's protocols.</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>This would not be a barrier to a placement at the school or homes if the young person's needs met the criteria for the provision.</p> <p>The school will be non-denominational. The young people and staff will be supported through person centred planning to determine the following faith requirements:</p> <ul style="list-style-type: none"> • Diet • Facilities and time for prayer • assess and document religious and spiritual needs. • observance of religious festivals and dates. 	<p>For any equality incidents based on religion or belief whether intentional or not we will provide opportunities to educate and support both the instigator and victim</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood,</p>	<p>This would not be a barrier to a placement at the school or homes if the young person's needs met the criteria for the provision</p> <p>Transport to and from school would be provided if the young person qualified under the transport policy (exceptions can also be made) therefore there would be no barriers to socio-economically disadvantaged.</p>	<p>The B&NES Affordable School Programme aims to 1) increase understanding of the barriers and challenges faced by pupils and families who are living with financial hardship and poverty. 2) help schools make positive changes to policies and practices https://thehub.bathnes.gov.uk/Page/21430</p>

<p>employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>		
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>This would not be a barrier to a placement at the school or homes if the young person's needs met the criteria for the provision. Transport would be provided to and from school if the young person qualified under the transport policy (exceptions can also be made) therefore there would be no barriers to rural communities</p>	<p>N/A</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>This would not be a barrier to a placement at the school or homes if the young person's needs met the criteria for the provision</p> <p>There is more info here: https://www.armedforcescovenant.gov.uk/about-the-covenant/</p>	<p>N/A</p>

<p>3.14 Care Experienced ***</p> <p>This working definition is currently under review and therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>Ensure Strategy addresses any issues around being care experienced raised by CYP accessing the school or living in the home.</p> <p>The school and home will access ongoing support and advice and interaction from the B&NES Care Experienced Social Care team: https://www.bathnes.gov.uk/local-offer</p>	<p>For any equality incidents based on care experience whether intentional or not we will provide opportunities to educate and support both the instigator and victim.</p>
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Placements within the residential element of the provision	Each young person will be considered individually	Following the opening of the provision – as each consultation is received by the appointed Trust	Education Trust that is appointed to run the provision	Prior to opening once a date is confirmed and on-going

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by:
Date: 7.10.25



(Divisional Director or nominated senior officer)