

## **Equality Impact Assessment / Equality Analysis**

<b>Item name</b>	<b>Details</b>
<b>New Social, Emotional, and Mental Health (SEMH) Specialist Inclusion Base at IKB Academy / Wellsway School Site (Wellsway Inclusion Specialist Base)</b>	<p>New Social, Emotional, and Mental Health (SEMH) Specialist Inclusion Base at IKB Academy / Wellsway School Site</p> <p>A new single-storey specialist inclusion base providing up to 20 specialist educational places for young people aged 11–19 with Social, Emotional, and Mental Health (SEMH) difficulties, including those receiving Hospital Education or otherwise unable to access mainstream schooling. All pupils will hold an Education, Health and Care Plan (EHCP). The specialist inclusion base will be located on the Bath Rd, Keynsham site shared by IKB Academy and Wellsway School.</p>
<b>Name of directorate and service</b>	Education and Safeguarding
<b>Name and role of officers completing the EIA</b>	Roselyn Edema, Programme Manager – SEND Capital and Sufficiency

<b>Date of assessment</b>	15 <sup>th</sup> June 2026
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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

<b>Key questions</b>	<b>Answers / notes</b>
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	B&NES Council will commission a new specialist Inclusion Base to be physically located on the IKB Academy / Wellsway School campus in Keynsham. The specialist base will be delivered by the Multi-Academy Trust (Futura Learning Partnership) operating the site, under a formal agreement with B&NES Council. Day-to-day operation will be jointly governed by the Trust, B&NES Education Commissioning, Education Inclusion Services. The intended outcomes are:

	<ul style="list-style-type: none"> <li>• To reduce the number of young people placed in out-of-county or out-of-area provisions by increasing local SEMH specialist capacity in line with the DfE SEND Reform Plan.</li> <li>• To improve life outcomes for young people by providing specialist support close to home, enabling access to their local community, families and employment opportunities</li> <li>• To support young people who are unable to attend mainstream school back into age-appropriate education and, over time, into mainstream settings for increasing proportions of their week</li> <li>• To improve cost value in line with the B&amp;NES Safety Valve/SEND Capital and Sufficiency Programme (SEND C&amp;SP).</li> </ul>
<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"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>Demand for specialist SEND educational places across Bath and North East Somerset has exceeded local capacity, resulting in a significant and growing reliance on costly independent and out-of-county placements for young people with Social, Emotional, and Mental Health (SEMH) needs.</p> <p>The new inclusion specialist provision is needed to increase the sufficiency of SEND educational places for pupils with SEMH difficulties aged 11–19 who have an Education, Health and Care Plan (EHCP) and who are currently receiving Hospital Education, Section 19 provision or equivalent, because they are too unwell to access mainstream school. This provision is subject to approval from the Department for Education via a Significant Change Application under the relevant regulatory framework. This process includes securing an increase in the school's Published Admission Number (PAN) to accommodate specialist educational places for pupils aged 11–19 with Social, Emotional, and Mental Health (SEMH) difficulties who have an Education, Health and Care Plan (EHCP). Furthermore, all placements will be contingent on an annual review of each student's EHCP to ensure their evolving needs are continuously met. The Council retains statutory duties under the Children and Families Act 2014 and the Education Act 1996 which shape but do not remove local discretion over how provision is configured and delivered.</p>

<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>No conflicts. The Resource Base directly supports the following B&amp;NES strategies and commitments:</p> <ul style="list-style-type: none"> <li>• B&amp;NES SEND Strategy and SEND Sufficiency Duty (Children and Families Act 2014)</li> <li>• B&amp;NES Safety Valve Agreement with the Department for Education</li> <li>• B&amp;NES Corporate Strategy 2023–2027 – improving outcomes for children with SEND</li> <li>• B&amp;NES – SEND Reform Plan</li> <li>• B&amp;NES Climate Emergency Policy – sustainable, energy-efficient build specification required</li> </ul>
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## 2. Consideration of available data, research and information

<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
<p><b>2.1</b> What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>School and residential staff will receive equalities training – this is mandatory</p>
<p><b>2.2</b> What is the equalities profile of service users?</p>	<p>Service users are young people aged 11–19 holding an Education, Health and Care Plan (EHCP), primarily presenting with Social, Emotional, and Mental Health (SEMH) needs including high anxiety, depression, Autism Spectrum Disorder (ASD) (diagnosed or undiagnosed), emotional-based school avoidance and, in some cases, self-harm. Young people may also have intersecting needs relating to neurodiversity, care experience, and socio-economic disadvantage. Their families and carers also form part of the service user community.</p>
<p><b>2.3</b> Are there any recent customer satisfaction surveys to refer to?</p>	<p>The gaps in local Social, Emotional, and Mental Health (SEMH) provision have been identified through:</p>

<p>What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<ul style="list-style-type: none"> <li>• B&amp;NES SEND sufficiency review and Joint Agency pool analysis, which identified a critical shortage of specialist SEMH places for secondary-age pupils</li> <li>• Rising out-of-area placement numbers and costs for young people with SEMH EHCPs.</li> <li>• National evidence confirming that girls and young women with autism are frequently under-identified and that their needs are internalised, making early intervention harder. See <a href="https://pmc.ncbi.nlm.nih.gov/articles/PMC9804357/">https://pmc.ncbi.nlm.nih.gov/articles/PMC9804357/</a></li> <li>• Feedback from schools indicating that young people on Hospital Education or Section 19 provision need stable, specialist educational environments</li> </ul>
<p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Engagement undertaken to date includes:</p> <ul style="list-style-type: none"> <li>• Meetings with Wellsway School, IKB Academy and Futura Learning Partnership (MAT) to develop and refine the project brief</li> <li>• Consultation with B&amp;NES Education Directorate (Education Commissioning, Education Inclusion Services and SEND) teams to define the pupil profile and accommodation schedule</li> <li>• Input from BB104 SEND Area Guidelines and the DfE Pattern Book to shape the design specification</li> </ul> <p>A full statutory planning consultation will be held as the design progresses, which will include public and community engagement. Engagement with young people and their families will be undertaken during the design phase to ensure the environment meets their needs.</p>
<p><b>2.5</b> 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>Future consultation will include:</p> <ul style="list-style-type: none"> <li>• Planning application consultation including accessibility and equalities impact as standing considerations</li> <li>• Co-design engagement with young people with SEMH and their families, using trauma-informed and accessible consultation methods</li> <li>• Engagement with disability, neurodiversity and LGBTQ+ organisations to ensure the physical environment and service model are inclusive</li> </ul> <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. However, 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

<b>Key questions</b>	<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.1 Issues relating to all groups</b> and protected characteristics	Once open, the inclusion specialist base will be available to all eligible young people with an EHCP and SEMH needs, aged 11–19, regardless of any protected characteristic. Within that cohort, person-centred EHCP planning will ensure reasonable adjustments are made to meet individual needs. The physical design follows BB104 SEND guidelines to create a safe, accessible and inclusive environment.	The cohort is defined by clinical/educational need and age, which creates a lawful and proportionate age restriction. Within SEN, the statutory EHCP consultation process (s.39 Children and Families Act 2014) provides the legal framework for placement decisions, including any appeals. The LA and Trust will ensure this process is followed rigorously and that no young person is disadvantaged on the basis of a protected characteristic within the eligible cohort.
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	The Resource Base is open to all eligible young people regardless of sex. The design includes separate male, female and unisex self-contained toilet cubicles. 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 intended negative impact based on sex. Staff training will include awareness of sex-specific presentations of SEMH and autism. All admissions decisions will comply with admissions law and the Equality Act 2010.
<b>3.3 Pregnancy and maternity</b>	Pregnancy or maternity status would not be a barrier to a placement at the Resource Base provided the young person’s needs met the criteria for the provision. Safeguarding and pastoral protocols will be in place, including age-appropriate RSHE	Young people over the age of 16 could theoretically become pregnant. Safeguarding protocols and pastoral support structures will be in place to manage this on a case-by-case basis in line with national guidance and EHCP

	(Relationships, Sex and Health Education) delivered sensitively.	provision. Risk assessments and multi-agency working will be activated as appropriate.
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	Gender reassignment would not be a barrier to placement if the young person’s needs meet the criteria. The Resource Base will provide an inclusive environment: use of preferred names and pronouns will be standard practice; unisex self-contained toilet cubicles are included in the design brief. Research indicates that autistic and neurodivergent young people are disproportionately likely to identify as transgender or non-binary, making this a significant consideration for this cohort. Staff will receive relevant training and have access to specialist support agencies (e.g. Off the Record, SARI).	<p>Transgender and non-binary young people may face additional challenges in a residential-adjacent educational environment. Consideration will be given to healthcare access, continuity of care and mental health support for young people questioning or affirming their gender identity. Each situation will be handled on a case-by-case basis.</p> <p>Joint Working with the Trust to:</p> <ul style="list-style-type: none"> <li>• Facilitate access to appropriate and continuous healthcare</li> <li>• Exhibit respect for non-conforming gender identities</li> <li>• Seek informed consent before treatment decisions and involve young people in decision-making</li> <li>• Reference BMA guidance on inclusive care for trans and non-binary patients</li> </ul> <p><a href="https://www.bma.org.uk/advice-and-support/equality-and-diversity-guidance/lgbtplus-equality-in-medicine/inclusive-care-of-trans-and-non-binary-patients">https://www.bma.org.uk/advice-and-support/equality-and-diversity-guidance/lgbtplus-equality-in-medicine/inclusive-care-of-trans-and-non-binary-patients</a></p>
<b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and	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.	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>mental impairments and mental health)</p>	<p>The building is required to be accessible (BB104 and building regulations), including provision of an accessible toilet. The design incorporates calming, flexible and sensory-aware spaces. The Resource Base is designed for young people with mental health and neurodevelopmental conditions; their disability is the purpose of the provision, not a barrier to it</p>	
<p><b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups</p>	<p>The Specialist Inclusion Base is specifically designed for young people aged 11–19 with SEMH difficulties and an EHCP. The provision is age-appropriate, offering both secondary-age and post-16 curriculum access and transition support. Pupils will have individualised timetables that progress from the base toward greater time in mainstream as wellbeing improves.</p>	<p>There are no mitigations to this. By definition the provision is limited to those aged 11–19. This is a lawful and proportionate age restriction in line with the statutory EHCP framework. Post-16 provision and transition planning will be embedded in each pupil’s EHCP review process.</p>
<p><b>3.7 Race</b> – 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 based on race or ethnicity.</p> <p>The Trust will be encouraged to sign up to the B&amp;NES Race Equality Charter Mark for schools. <a href="https://beta.bathnes.gov.uk/race-equality-charter-schools">https://beta.bathnes.gov.uk/race-equality-charter-schools</a></p> <p>Individual Education, Health and Care Plans (EHCPs) will capture and respect cultural needs, including dietary requirements, skin and hair hygiene needs, culturally specific resources, and language needs. Staff training will include race equality and cultural competency.</p> <p>A zero-tolerance policy for racial bias or incidents will be in place.</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 and there will be a no tolerance policy in place for bias.</p>

<p><b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>	<p>Sexual orientation would not be a barrier to a placement. The inclusion specialist base will promote an inclusive, non-judgemental environment for all sexual orientations. Research confirms that neurodivergent young people, including autistic CYP, are significantly more likely to identify as LGBTQ+ (<a href="https://nhs.uk/news/2018/07/12/lgbtq-people-are-more-likely-to-be-neurodivergent">https://nhs.uk/news/2018/07/12/lgbtq-people-are-more-likely-to-be-neurodivergent</a>), making this a particularly important consideration for this cohort.</p> <p>Positive inclusive practice will promote and respect the sexual orientation of all individuals. RSHE will be delivered in an inclusive and age-appropriate manner.</p>	<p>For any equality incidents based on sexual orientation, whether intentional or not, we will engage relevant services to educate and support both parties – for example Off the Record. Individual Education, Health And Care Plan (EHCPs) may reflect support needs related to LGBTQ+ identity. The Trust will ensure staff are trained in LGBTQ+ inclusive practice and that the environment is affirmingly safe.</p>
<p><b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?</p>	<p>Marriage and civil partnership status would not be a barrier to a placement, provided the young person’s needs met the criteria for the provision. All pupils will be treated equally regardless of family structure or household composition.</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><b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>Religion or belief would not be a barrier to a placement. The Resource Base will be non-denominational. Person-centred planning through the EHCP will identify and support individual faith requirements including:</p> <ul style="list-style-type: none"> <li>• Dietary requirements</li> <li>• Facilities and time for prayer where requested</li> <li>• Observance of religious festivals and significant dates</li> </ul>	<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. We aim to ensure that no young person experiences disadvantage or harassment on the grounds of religion or belief, or lack thereof</p>

	<ul style="list-style-type: none"> <li>• Assessment and recording of religious and spiritual needs</li> </ul>	
<p><b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b></p>	<p>Socio-economic disadvantage would not be a barrier to a placement at the Inclusion Specialist Bases provided the young person’s needs met the criteria. Statutory SEND transport will be provided where the pupil qualifies under the B&amp;NES transport policy (and exceptions can also be made), removing financial barriers to access. Uniform and resource costs will be managed in line with the Trust’s pupil premium and free school meals policies.</p>	<p>All young people will be supported to respect differences such as clothing, diet, home area and family circumstances. The B&amp;NES Affordable School Programme supports schools in addressing barriers faced by pupils living with financial hardship. Pupil premium funding linked to each young person’s EHCP and LAC status will provide additional resource where applicable. See: <a href="https://thehub.bathnes.gov.uk/Page/21430">https://thehub.bathnes.gov.uk/Page/21430</a></p>
<p><b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities</p>	<p>Living in a rural area would not be a barrier to a placement provided the young person’s needs met the criteria. Statutory SEND transport will be arranged to and from the Resource Base where the young person qualifies under the transport policy (with exceptions available), removing access barriers for rural families.</p>	<p>N/A</p>
<p><b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by</p>	<p>Armed Forces community status would not be a barrier to a placement provided the young person’s needs met the criteria. We aim to pay due regard to the Armed Forces Covenant when developing policies and procedures to ensure service children and their families are not disadvantaged.</p>	<p>N/A</p>

<p>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>There is more info here:  <a href="https://www.armedforcescovenant.gov.uk/about-the-covenant/">https://www.armedforcescovenant.gov.uk/about-the-covenant/</a></p>	
<p><b>3.14 Care Experienced</b>  ***  This working definition is currently under review and therefore subject to change:    In B&amp;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 inclusion specialist base.</p> <p>The school and home will access ongoing support and advice from the B&amp;NES Care Experienced Social Care team: <a href="https://www.bathnes.gov.uk/local-offer">https://www.bathnes.gov.uk/local-offer</a></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>

\*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.

<b>Issues identified</b>	<b>Actions required</b>	<b>Progress milestones</b>	<b>Officer responsible</b>	<b>By when</b>

#### **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](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Christopher Wilford

A handwritten signature in black ink, appearing to read 'C Wilford', written in a cursive style.

**Date:** 22.06.26