

Appendix 19 (1) - Equality Impact Assessment – Staffing Impacts of Proposed Closure of Arreton CE Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning Consultation – Arreton Church of England Primary School – Staffing Impacts Aim: Proposed school closure Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections. Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision-making process.								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this group from obtaining services or limit their participation in any aspect of public life?)	How will you advance the equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not.	What concerns have been raised to date during consultation (or early discussions) and what action taken to date?	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How will this be addressed?	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished, can this be legally justified?)

<p>Age (restrictions/difficulties both younger/older)</p>	<p>Negative impact</p> <p>There will be impacts to all ages (18 – 65+ inclusive) as the proposal to close Arreton CE Primary will affect the employment status of staff at this school.</p> <p>Arreton CE Primary has 2 members of staff aged 60+. Older staff may find it more challenging to secure new employment due to age-related biases or may impact on their retirement plans (either retiring earlier or working longer to compensate for loss of income).</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing age breakdown of staff.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school.</p> <p>Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p> <p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>
<p>Disability a) Physical b) Mental health (must respond to both a & b)</p>	<p>No impact based on full consultation and data available</p>	<p>There are no staff who currently work at Arreton CE Primary who are known to have registered as having a disability (either mental or physical). However, there may be a gap in the data and any disabilities raised during the individual consultation will be reviewed and reasonable adjustments put in place as necessary.</p>	<p>There is no data showing staff at this school who have identified themselves as having a disability. However, if any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>Data on HR staffing figures showing whether staff members have a stated disability.</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>
<p>Race (including ethnicity and nationality)</p>	<p>No impact based on full consultation and data available</p>	<p>All staff who currently work at Arreton CE Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing ethnicity and nationality of staff members.</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>N/A – to be reviewed if raised at staff consultation</p>
<p>Religion or belief (different faith groups/those without a faith)</p>	<p>Potential negative impacts</p> <p>Arreton CE Primary is a Church of England school. The closure of this school would negatively impact staff who wish to specifically work at a faith/Church of England school.</p>	<p>There is no available information on the personal religious belief of staff at Arreton CE Primary. However, by the fact that Arreton is a Church of England school it can be assumed (supported by comments made in the public consultation) that for many staff this is an intentional choice.</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the redeployment process.</p>	<p>There have been concerns raised by staff over the closure of the school in limiting choice of Church of England schools both in the locality (Newport) and on the Island – for both pupils and staff who wish to</p>	<p>Responses during the consultation period</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school</p>

		The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school – meaning there is potential for negative impacts.		work at a C of E school			
Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)	Negative impacts Females will be disproportionately affected by the decision as the overwhelming majority of school staff are women (91%) based on staffing figures for Arreton CE Primary.	Women will be disproportionately affected (evidenced by staffing data on gender) by the proposed closure as this would affect employment status. All staff will be supported through a redeployment process if the decision to close the school were to be taken. The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.		No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.	Responses during the consultation period School staffing data for Arreton CE Primary which shows that 91% of staff are female.		HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.
Sexual orientation (is your language inclusive of LGB groups?)	No impact or concern has been raised during the consultation to date	Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment. Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.	N/A	No concerns have been raised to date through public consultation in relation to sexual orientation.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Pregnancy and maternity	No identified impacts There is no information available currently showing that any staff are pregnant or will be on maternity leave. If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.	Pregnancy and maternity will be taken into consideration and relevant legislation will be applied to ensure no unlawful discrimination. Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.	If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.	No concerns have been raised to date through public consultation in relation to pregnancy and maternity status.	Responses during the consultation period		There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)
Marriage and Civil Partnership	No impact or concern has been raised during the consultation to date	Marital or civil partnership status does not inform any part of the recruitment process for school staffing	N/A	No concerns have been raised to date through public consultation in	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

		so no impact is expected but will be addressed if raised during staff consultation.		relation to marriage and civil partnership.			
Gender reassignment	No impact or concern has been raised during the consultation to date	Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to gender reassignment.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:	Name: Date:
Legal sign off & date:	Name: Date:

Appendix 19 (2) - Equality Impact Assessment – Staffing Impacts of Proposed Closure of Brading CE Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to —

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning Consultation – Brading Church of England Primary School – Staffing Impacts								
Aim: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections.								
Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections.								
Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision-making process.								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this group from obtaining	How will you advance the equality of opportunity and to foster good relations between people who share a	What concerns have been raised to date during consultation (or early discussions) and what action taken to date?	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How will this be addressed?	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished, can this be legally justified?)

		services or limit their participation in any aspect of public life?)	protected characteristic and people who do not.					
Age (restrictions/difficulties both younger/older)	<p>Negative impact</p> <p>There will be impacts to all ages (18 – 65+ inclusive) as the proposal to close Brading CE Primary will affect the employment status of staff at this school.</p> <p>Brading CE Primary has 4 members of staff aged 60+. Older staff may find it more challenging to secure new employment due to age-related biases or may impact on their retirement plans (either retiring earlier or working longer to compensate for loss of income).</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing age breakdown of staff.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school.</p> <p>Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>
Disability a) Physical b) Mental health (must respond to both a & b)	<p>No impact based on full consultation and data available</p>	<p>There are no staff who currently work at Brading CE Primary who are known to have registered as having a disability (either mental or physical). However, there may be a gap in the data and any disabilities raised during the individual consultation will be reviewed and reasonable adjustments put in place as necessary.</p>	<p>There is no data showing staff at this school who have identified themselves as having a disability. However, if any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>Data on HR staffing figures showing whether staff members have a stated disability.</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>	
Race (including ethnicity and nationality)	<p>No impact based on full consultation and data available</p>	<p>All staff who currently work at Brading CE Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing ethnicity and nationality of staff members.</p>		<p>N/A – to be reviewed if raised at staff consultation</p>	
Religion or belief (different faith groups/those without a faith)	<p>Potential negative impacts</p> <p>Brading CE Primary is a Church of England school. The closure of this school would negatively impact staff who wish to specifically work at a faith/Church of England school.</p>	<p>There is no available information on the personal religious belief of staff at Brading CE Primary. However, by the fact that Brading is a Church of England school it can be assumed (supported by comments made in the</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the</p>	<p>There have been concerns raised by staff over the closure of the school in limiting choice of Church of England schools both in the locality (Sandown & Shanklin) and on the</p>	<p>Responses during the consultation period</p>		<p>The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school</p>	

		<p>public consultation) that for many staff this is an intentional choice.</p> <p>The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school – meaning there is potential for negative impacts.</p>	<p>redeployment process.</p>	<p>Island – for both pupils and staff who wish to work at a C of E school</p>			
<p>Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)</p>	<p>Negative impacts</p> <p>Females will be disproportionately affected by the decision as the overwhelming majority of school staff are women (90%) based on staffing figures for Brading CE Primary.</p>	<p>Women will be disproportionately affected (evidenced by staffing data on gender) by the proposed closure as this would affect employment status.</p> <p>All staff will be supported through a redeployment process if the decision to close the school were to be taken.</p> <p>The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p>		<p>No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.</p>	<p>Responses during the consultation period</p> <p>School staffing data for Brading CE Primary which shows that 90% of staff are female.</p>		<p>HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.</p>
<p>Sexual orientation (is your language inclusive of LGB groups?)</p>	<p>No impact or concern has been raised during the consultation to date</p>	<p>Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to sexual orientation.</p>	<p>Responses during the consultation period</p>		<p>N/A – to be reviewed if raised at staff consultation</p>
<p>Pregnancy and maternity</p>	<p>No identified impacts</p> <p>There is no information available currently showing that any staff are pregnant or will be on maternity leave.</p> <p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.</p>	<p>Pregnancy and maternity will be taken into consideration and relevant legislation will be applied to ensure no unlawful discrimination.</p> <p>Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.</p>	<p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation in relation to pregnancy and maternity status.</p>	<p>Responses during the consultation period</p>		<p>There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)</p>

Marriage and Civil Partnership	No impact or concern has been raised during the consultation to date	Marital or civil partnership status does not inform any part of the recruitment process for school staffing so no impact is expected but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to marriage and civil partnership.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Gender reassignment	No impact or concern has been raised during the consultation to date	Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to gender reassignment.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:

Name:

Date:

Legal sign off & date:

Name:

Date:

Appendix 19 (3) - Equality Impact Assessment – Staffing Impacts of Proposed Closure of Cowes Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning Consultation – Cowes Primary School – Staffing Impacts								
Aim: Proposed closure of Cowes Primary School - all pupils would be offered a school place at Gurnard Primary School (or able to preference an alternative school). This proposal would remove 30 places for each year group (210 school places in total) from the planning area. Blackberry Lane Preschool could remain at the current site of Cowes Primary School and offered the option to expand utilising part of the school site if additional capacity is required in the area.								
Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections.								
Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision making process.								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this	How will you advance the equality of opportunity and to foster good relations between	What concerns have been raised to date during consultation (or early discussions)	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished,

		group from obtaining services or limit their participation in any aspect of public life?)	people who share a protected characteristic and people who do not.	and what action taken to date?		will this be addressed?		can this be legally justified?)
Age (restrictions/difficulties both younger/older)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p> <p>There is no data at present to show the numbers of staff who may fall into these more at risk groups – the impact will be updated as more information becomes available.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school. Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p> <p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p> <p>At the present time, there is no staffing data for Cowes Primary.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>
Disability a) Physical b) Mental health (must respond to both a & b)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>There are no staff who currently work at Cowes Primary who are known to have registered as having a disability (either mental or physical). However, there may be a gap in the data and any disabilities raised during the individual consultation will be reviewed and reasonable adjustments put in place as necessary.</p>	<p>There is no data showing staff at this school who have identified themselves as having a disability. However, if any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>At the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>At the present time, there is no staffing data for Cowes Primary.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>	
Race (including ethnicity and nationality)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>All staff who currently work at Cowes Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Cowes Primary.</p>	<p>This will be updated throughout the process when more data becomes available.</p>	<p>N/A – to be reviewed if raised at staff consultation</p>	

					This will be updated throughout the process when more data becomes available.			
Religion or belief (different faith groups/those without a faith)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>There is no available information on the personal religious belief of staff at Cowes Primary. However, there have been no recorded concerns regarding religion or faith to date in any of the consultations. Cowes Primary is not a religious or faith school and all other schools within the locality (Cowes West) are secular, too. There are unlikely to be any impacts arising from this area but this will need to be reviewed when more information is available.</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the redeployment process.</p>	<p>There have been no concerns raised by staff in regard to potential impacts to this protected characteristic of religion or belief.</p>	<p>Responses during the consultation period</p>			<p>The council would support staff who are redeployed or looking for alternative employment</p>
Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)	<p>Negative impacts</p> <p>Females are likely to be disproportionately affected by the decision as the overwhelming majority of school staff are women (75%) based on national staffing figures. At the present time, there is no staffing data for Cowes Primary.</p>	<p>Women will be disproportionately affected (evidenced by staffing data on gender nationally) by the proposed closure as this would affect employment status.</p> <p>All staff will be supported through a redeployment process if the decision to close the school were to be taken.</p> <p>The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p>		<p>No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Cowes Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>			<p>HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.</p>
Sexual orientation (is your language inclusive of LGB groups?)	<p>No impact or concern has been raised during the consultation to date</p>	<p>Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to sexual orientation.</p>	<p>Responses during the consultation period</p>			<p>N/A – to be reviewed if raised at staff consultation</p>
Pregnancy and maternity	<p>No identified impacts</p> <p>There is no information available currently showing that any staff are</p>	<p>Pregnancy and maternity will be taken into consideration and relevant legislation will</p>	<p>If any staff are pregnant or on maternity leave during the relevant</p>	<p>No concerns have been raised to date through public consultation in</p>				<p>There is additional protection for staff who are pregnant or on maternity leave (up to 18</p>

	<p>pregnant or will be on maternity leave.</p> <p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.</p>	<p>be applied to ensure no unlawful discrimination.</p> <p>Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.</p>	<p>period, specific support from HR will be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.</p>	<p>relation to pregnancy and maternity status.</p>	<p>Responses during the consultation period</p>		<p>months post birth) in accordance with legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)</p>
Marriage and Civil Partnership	<p>No impact or concern has been raised during the consultation to date</p>	<p>Marital or civil partnership status does not inform any part of the recruitment process for school staffing so no impact is expected but will be addressed if raised during staff consultation.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to marriage and civil partnership.</p>	<p>Responses during the consultation period</p>		<p>N/A – to be reviewed if raised at staff consultation</p>
Gender reassignment	<p>No impact or concern has been raised during the consultation to date</p>	<p>Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will be addressed if raised during staff consultation.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to gender reassignment.</p>	<p>Responses during the consultation period</p>		<p>N/A – to be reviewed if raised at staff consultation</p>

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:

Name:

Date:

Legal sign off & date:

Name:

Date:

Appendix 19 (4) - Equality Impact Assessment – Staffing Impacts of Proposed Closure of Godshill Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning Consultation – Godshill Primary School – Staffing Impacts								
Aim: Proposed closure of Godshill Primary School, with pupils offered a school place at Niton Primary School or St Francis Roman Catholic and Church of England School through the use of existing and additional temporary accommodation (or be able to preference an alternative school).								
Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections								
Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision making process								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this group from obtaining	How will you advance the equality of opportunity and to foster good relations between people who share a	What concerns have been raised to date during consultation (or early discussions) and what action taken to date?	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How will this be addressed?	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished, can this be legally justified?)

		services or limit their participation in any aspect of public life?)	protected characteristic and people who do not.					
Age (restrictions/difficulties both younger/older)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p> <p>There is no data at present to show the numbers of staff who may fall into these more at risk groups – the impact will be updated as more information becomes available.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school. Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p> <p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p> <p>At the present time, there is no staffing data for Godshill Primary.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>
Disability a) Physical b) Mental health (must respond to both a & b)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>There are no staff who currently work at Godshill Primary who are known to have registered as having a disability (either mental or physical). However, there may be a gap in the data and any disabilities raised during the individual consultation will be reviewed and reasonable adjustments put in place as necessary.</p>	<p>There is no data showing staff at this school who have identified themselves as having a disability. However, if any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>At the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>Further consultation activity should ensure that this happens to understand the full impacts on staff.</p> <p>At the present time, there is no staffing data for Godshill Primary.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>	
Race (including ethnicity and nationality)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>All staff who currently work at Godshill Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the</p>	<p>This will be updated throughout the process when more data becomes available.</p>		<p>N/A – to be reviewed if raised at staff consultation</p>

					process when more data becomes available.			
Religion or belief (different faith groups/those without a faith)	<p>No impact based on consultation to date</p> <p>N.B at the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>	<p>There is no available information on the personal religious belief of staff at Godshill Primary. However, there have been no recorded concerns regarding religion or faith to date in any of the consultations. Godshill Primary is not a religious or faith school and all other schools within the locality (Ventnor) are secular, too. There are unlikely to be any impacts arising from this area but this will need to be reviewed when more information is available.</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the redeployment process.</p>	<p>There have been no concerns raised by staff in regard to potential impacts to this protected characteristic of religion or belief.</p>	<p>Responses during the consultation period</p>			<p>The council would support staff who are redeployed or looking for alternative employment</p>
Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)	<p>Negative impacts</p> <p>Females are likely to be disproportionately affected by the decision as the overwhelming majority of school staff are women (75%) based on national staffing figures. At the present time, there is no staffing data for Godshill Primary.</p>	<p>Women will be disproportionately affected (evidenced by staffing data on gender nationally) by the proposed closure as this would affect employment status.</p> <p>All staff will be supported through a redeployment process if the decision to close the school were to be taken.</p> <p>The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p>		<p>No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.</p>	<p>Responses during the consultation period</p> <p>At the present time, there is no staffing data for Godshill Primary.</p> <p>This will be updated throughout the process when more data becomes available.</p>			<p>HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.</p>
Sexual orientation (is your language inclusive of LGB groups?)	<p>No impact or concern has been raised during the consultation to date</p>	<p>Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to sexual orientation.</p>	<p>Responses during the consultation period</p>			<p>N/A – to be reviewed if raised at staff consultation</p>
Pregnancy and maternity	<p>No identified impacts</p> <p>There is no information available currently showing that any staff are pregnant or will be on maternity leave.</p>	<p>Pregnancy and maternity will be taken into consideration and relevant legislation will be applied to ensure no unlawful discrimination.</p>	<p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will</p>	<p>No concerns have been raised to date through public consultation in relation to pregnancy and maternity status.</p>	<p>Responses during the consultation period</p>			<p>There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with</p>

	If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.	Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.	be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.				legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)
Marriage and Civil Partnership	No impact or concern has been raised during the consultation to date	Marital or civil partnership status does not inform any part of the recruitment process for school staffing so no impact is expected but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to marriage and civil partnership.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Gender reassignment	No impact or concern has been raised during the consultation to date	Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to gender reassignment.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:

Name:

Date:

Legal sign off & date:

Name:

Date:

Appendix 19 (5) - Equality Impact Assessment – Staffing Impacts Proposed Closure of Oakfield CE Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning Consultation – Oakfield Church of England Primary School – Staffing Impacts								
Aim: Proposed closure of Oakfield Church of England Primary School - all pupils would be offered a school place at Greenmount or St Mary's Catholic primary schools (or able to preference an alternative school).								
Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections.								
Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision making process.								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this group from obtaining services or limit their	How will you advance the equality of opportunity and to foster good relations between people who share a protected	What concerns have been raised to date during consultation (or early discussions) and what action taken to date?	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How will this be addressed?	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished, can this be legally justified?)

		participation in any aspect of public life?)	characteristic and people who do not.					
Age (restrictions/difficulties both younger/older)	<p>Negative impact</p> <p>There will be impacts to all ages (18 – 65+ inclusive) as the proposal to close Oakfield CE Primary will affect the employment status of staff at this school.</p> <p>Oakfield CE Primary has 9 members of staff aged 60+. Older staff may find it more challenging to secure new employment due to age-related biases or may impact on their retirement plans (either retiring earlier or working longer to compensate for loss of income).</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing age breakdown of staff.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school.</p> <p>Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>	
<p>Disability</p> <p>a) Physical</p> <p>b) Mental health</p> <p>(must respond to both a & b)</p>	<p>Potential negative impact</p> <p>Based on staffing figures.</p>	<p>Numbers of staff with a disability is so low as to allow possible identification – therefore, numbers will not be provided in this EIA. While this does not represent a disproportionate impact on staff, any possible redeployment processes must be mindful to the needs of staff and take into account the Equality Act 2010 to ensure they are not discriminated against or disadvantaged by the process.</p>	<p>If any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>Data on HR staffing figures showing whether staff members have a stated disability.</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>	
Race (including ethnicity and nationality)	<p>No impact based on full consultation and data available</p>	<p>All staff who currently work at Oakfield CE Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing ethnicity and nationality of staff members.</p>		<p>N/A – to be reviewed if raised at staff consultation</p>	
Religion or belief (different faith groups/those without a faith)	<p>Potential negative impacts</p> <p>Oakfield CE Primary is a Church of England school. The closure of this school would negatively impact staff who wish to specifically work at a faith/Church of England school.</p>	<p>There is no available information on the personal religious belief of staff at Oakfield CE Primary. However, by the fact that Oakfield is a Church of England school it can be assumed (supported by comments made in the public consultation) that for</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the redeployment process.</p>	<p>There have been concerns raised by staff over the closure of the school in limiting choice of Church of England schools both in the locality (Ryde) and on the Island – for both pupils and staff</p>	<p>Responses during the consultation period</p>		<p>The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school</p>	

		<p>many staff this is an intentional choice.</p> <p>The council would support staff who are redeployed or looking for alternative employment but there is no guarantee that this could be at a faith/Church of England school – meaning there is potential for negative impacts.</p>		who wish to work at a C of E school			
<p>Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)</p>	<p>Negative impacts</p> <p>Females will be disproportionately affected by the decision as the overwhelming majority of school staff are women (83%) based on staffing figures for Oakfield CE Primary.</p>	<p>Women will be disproportionately affected (evidenced by staffing data on gender) by the proposed closure as this would affect employment status.</p> <p>All staff will be supported through a redeployment process if the decision to close the school were to be taken.</p> <p>The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p>		<p>No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.</p>	<p>Responses during the consultation period</p> <p>School staffing data for Oakfield CE Primary which shows that 91% of staff are female.</p>		<p>HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.</p>
<p>Sexual orientation (is your language inclusive of LGB groups?)</p>	<p>No impact or concern has been raised during the consultation to date</p>	<p>Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.</p>	N/A	<p>No concerns have been raised to date through public consultation in relation to sexual orientation.</p>	<p>Responses during the consultation period</p>		<p>N/A – to be reviewed if raised at staff consultation</p>
<p>Pregnancy and maternity</p>	<p>No identified impacts</p> <p>There is no information available currently showing that any staff are pregnant or will be on maternity leave.</p> <p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.</p>	<p>Pregnancy and maternity will be taken into consideration and relevant legislation will be applied to ensure no unlawful discrimination.</p> <p>Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.</p>	<p>If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation in relation to pregnancy and maternity status.</p>	<p>Responses during the consultation period</p>		<p>There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)</p>

Marriage and Civil Partnership	No impact or concern has been raised during the consultation to date	Marital or civil partnership status does not inform any part of the recruitment process for school staffing so no impact is expected but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to marriage and civil partnership.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Gender reassignment	No impact or concern has been raised during the consultation to date	Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to gender reassignment.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:	Name: Date:
Legal sign off & date:	Name: Date:

Appendix 19 (6) - Equality Impact Assessment – Staffing Impacts of Proposed Closure of Wroxall Primary School

Before reading the Equality Impact Assessment, decision-makers should take the time to read and consider the following from the Council's Public Sector Equality Duty, United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child.

1. Section 149, which sets out the Council's Public Sector Equality Duty (PSED), provides:

"149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are —

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to —

- a) a breach of an equality clause or rule;
- b) a breach of a non-discrimination rule."

2. In relation to disability, the Council must ensure that it acts in accordance with section 29 of the Equality Act 2010, which provides:

"(6) A person must not, in the exercise of a public function that is not the provision of a service to the public or a section of the public, do anything that constitutes discrimination, harassment or victimisation.

(7) A duty to make reasonable adjustments applies to —

- (b) a person who exercises a public function that is not the provision of a service to the public or a section of the public."

3. In relation to disability, the Council's decision makers should bear in mind need to have drawn to their attention the relevant parts of the United Nations Convention on the Rights of Persons with Disabilities, which refer to:

(1) Promoting, protecting and ensuring the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and promoting respect for their inherent dignity (Article 1).

(2) (a) Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons; (b) Non-discrimination; (c) Full and effective participation and inclusion in society; (d) Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity; (e) Equality of opportunity; (f) Accessibility; (g) Equality between men and women; (h) Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities. (Article 3)

(3) In order to promote equality and eliminate discrimination, taking all appropriate steps to ensure that reasonable adjustment is provided. (Article 5).

4. In relation to children the Council's decision makers should bear in mind parts of the United Nations Convention on the Rights of the Child which refer to:

(1) respecting and ensuring the rights set forth in the Convention to each child without discrimination of any kind, irrespective of the child's, or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status (Art 2)

(2) ensuring the child such protection and care as is necessary for his or her well-being (Art 3)

(3) recognising that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community (Art 23)

(4) recognising and seeking to implement the right of the child to the enjoyment of the highest attainable standard of health, including taking appropriate measures: to diminish infant and child mortality; to combat disease, taking into consideration the dangers and risks of environmental pollution (Art 24)

(5) recognising the right of the child to education, with a view to achieving this right progressively and on the basis of equal opportunity (Art 28).

5. This assessment will set out actions that will be taken to mitigate or minimise any negative impacts. Where mitigating action cannot be taken, or the impacts cannot be wholly mitigated, the reason why will be explained.

Assessor(s) Name and job title:								
Naomi Carter Service Director for Education, Access & Inclusion								
Directorate and Team/School Name:								
Children's Social Care								
Name, aim, objective and expected outcome of the programme/ activity:								
Name: School Place Planning – Wroxall Primary School – Staffing Impacts								
Aim: Proposed closure of Wroxall Primary School, with pupils offered a school place at St Francis Roman Catholic and Church of England Primary School through the use of existing and additional temporary accommodation (or be able to preference an alternative school).								
Objective: The aim of this EIA is to assess the findings of the first stage of consultation and clarify if there are any significant issues to prevent moving to the next stage of consultation, which is to proceed to the issuing of the statutory notice. This will provide further opportunity for parents, pupils, staff, stakeholders and wider community to give their views and raise any objections.								
Expected outcome: To provide clarity that all information has been reviewed, considered and ensure Cabinet are informed in their decision making process.								
Reason for Equality Impact Assessment (tick as appropriate)								
This is a new policy/strategy/service/system function proposal								
This is a proposal for a change to a policy/strategy/service/system function proposal function (<i>check whether the original decision was equality impact assessed</i>)								
Removal of a policy/strategy/service/system function proposal								
Commencing any project/programme								
Equality and Diversity considerations								
Describe the ways in which the groups below may be impacted by your activity (prior to mitigation). The impact may be negative, positive or no impact.								
Protected Characteristic	Negative, positive or no impact (before mitigation/intervention) and why?	Does the proposal have the potential to cause unlawful discrimination (is it possible that the proposal may exclude/restrict this group from obtaining	How will you advance the equality of opportunity and to foster good relations between people who share a	What concerns have been raised to date during consultation (or early discussions) and what action taken to date?	What evidence, analysis or data has been used to substantiate your answer?	Are there any gaps in evidence to properly assess the impact? How will this be addressed?	How will you make communication accessible for this group?	What adjustments have been put in place to reduce/advance the inequality? (Where it cannot be diminished, can this be legally justified?)

		services or limit their participation in any aspect of public life?)	protected characteristic and people who do not.					
Age (restrictions/difficulties both younger/older)	<p>Negative impact</p> <p>There will be impacts to all ages (18 – 65+ inclusive) as the proposal to close Wroxall Primary will affect the employment status of staff at this school.</p> <p>Wroxall Primary has 9 members of staff aged 60+. Older staff may find it more challenging to secure new employment due to age-related biases or may impact on their retirement plans (either retiring earlier or working longer to compensate for loss of income).</p>	<p>The proposal would not cause unlawful discrimination to any age group.</p> <p>Each age group would be affected to the same degree. The age of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.</p> <p>However, some age groups (particularly those under 25 or over 60) may be more adversely affected as a result of this decision due to personal factors, such as the number of people who are financially dependent on that individual, which may be attributable in degree to the life stage of an individual.</p>	<p>Hold consultation with staff members who are affected by the proposal, if the decision for closure were to be taken, so their concerns can be understood.</p>	<p>No concerns related to age have been raised to date through consultation process.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing age breakdown of staff.</p>	<p>Consultation responses to date have been collected via general comments to thoughts and feelings of closure to the school.</p> <p>Responses by staff who are affected by a proposed school closure can be identified, and this has been analysed to understand stated impacts to protected characteristics.</p>	<p>All staff will be provided with the opportunity for individual consultation sessions as part of the closure process, which will explore the protected characteristics in more detail. These individual consultations will be tailored to the individual to suit them and their preferences. All care will be taken to accommodate staff affected by the potential closure process.</p>	<p>Reasonable adjustments will be considered and implemented as necessary where any inequalities are identified.</p>
Disability a) Physical b) Mental health (must respond to both a & b)	<p>No impact based on full consultation and data available</p>	<p>There are no staff who currently work at Wroxall Primary who are known to have registered as having a disability (either mental or physical). However, there may be a gap in the data and any disabilities raised during the individual consultation will be reviewed and reasonable adjustments put in place as necessary.</p>	<p>There is no data showing staff at this school who have identified themselves as having a disability. However, if any disabilities are clarified during individual staff consultation sessions, this opportunity can be used to understand their needs and how best to support them.</p>	<p>No concerns have been raised to date through public consultation.</p>	<p>Analysis of responses through consultation, as staff at affected schools can be identified.</p> <p>Data on HR staffing figures showing whether staff members have a stated disability.</p>	<p>However, the question of “how will this affect you as a staff member?” specifically has not yet been asked. Further consultation activity should ensure that this happens to understand the full impacts on staff.</p>	<p>Redeployment process for staff affected by the proposed closures</p> <p>Members of staff have and will continue to be offered access to mental health first aiders and the employee assistance programme to access mental health support if they are worried and/or concerned about the proposals</p>	
Race (including ethnicity and nationality)	<p>No impact or concern has been raised during the consultation to date</p>	<p>All staff who currently work at Wroxall Primary identify as either White British or White English as their ethnicity and British as their nationality. The proposed school closure does not appear to have any impact (positive or negative) on race.</p>	<p>N/A</p>	<p>No concerns have been raised to date through public consultation in relation to race.</p>	<p>Responses during the consultation period</p> <p>Data on HR staffing figures showing ethnicity and nationality of staff members.</p>		<p>N/A – to be reviewed if raised at staff consultation</p>	
Religion or belief (different faith groups/those without a faith)	<p>No impact or concern has been raised during the consultation to date</p>	<p>There is no available information on the personal religious belief of staff at Wroxall Primary. However, there have been no recorded concerns regarding religion or faith to date in any of the consultations.</p>	<p>This will be discussed with staff at their individual consultation meetings and the staff can make this preference clear during the</p>	<p>There have been no concerns raised by staff in regard to potential impacts to this protected characteristic of religion or belief.</p>	<p>Responses during the consultation period</p>		<p>The council would support staff who are redeployed or looking for alternative employment</p>	

			redeployment process.				
Sex (Including Trans and non-binary – is your language inclusive of trans and non-binary people?)	Negative impacts Females will be disproportionately affected by the decision as the overwhelming majority of school staff are women (93%) based on staffing figures for Wroxall Primary.	Women will be disproportionately affected (evidenced by staffing data on gender) by the proposed closure as this would affect employment status. All staff will be supported through a redeployment process if the decision to close the school were to be taken. The gender of an individual does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment.		No concerns have been raised in relation to sex during the consultation feedback to date. However, it is well evidenced that women will be disproportionately affected by any decision due to the staffing breakdown of the school.	Responses during the consultation period School staffing data for Wroxall Primary which shows that 93% of staff are female.		HR support will be provided to the predominantly female staff through the closure process if the decision were to be taken.
Sexual orientation (is your language inclusive of LGB groups?)	No impact or concern has been raised during the consultation to date	Sexual orientation does not inform any part of the recruitment process for school staffing so there would be no impact in this regard to redeployment. Analysis of responses to consultation to date show no staff member has raised concern about these impacts but if any are raised during the staff consultation process, they will be reviewed accordingly.	N/A	No concerns have been raised to date through public consultation in relation to sexual orientation.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Pregnancy and maternity	No identified impacts There is no information available currently showing that any staff are pregnant or will be on maternity leave. If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals. There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation.	Pregnancy and maternity will be taken into consideration and relevant legislation will be applied to ensure no unlawful discrimination. Analysis of responses to the consultation to date show no staff member has raised concern about these impacts. If any are raised during the staff consultation process, they will be reviewed accordingly. The staff FAQs address this issue.	If any staff are pregnant or on maternity leave during the relevant period, specific support from HR will be provided to these individuals in accordance with legislation. Individual sessions would be held with these member(s) of staff to understand their needs and how best to support them.	No concerns have been raised to date through public consultation in relation to pregnancy and maternity status.	Responses during the consultation period		There is additional protection for staff who are pregnant or on maternity leave (up to 18 months post birth) in accordance with legislation (The Equality Act 2010 and Maternity and Parental Leave etc. Regulations 1999)
Marriage and Civil Partnership	No impact or concern has been raised during the consultation to date	Marital or civil partnership status does not inform any part of the recruitment process for school staffing so no impact is expected but will be addressed if raised during staff consultation.	N/A	No concerns have been raised to date through public consultation in relation to marriage and civil partnership.	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation
Gender reassignment	No impact or concern has been raised during the consultation to date	Gender reassignment status does not inform any part of the recruitment process for school staffing no negative impact in this regard but will	N/A	No concerns have been raised to date through public consultation in	Responses during the consultation period		N/A – to be reviewed if raised at staff consultation

		be addressed if raised during staff consultation.		relation to gender reassignment.				
--	--	---	--	----------------------------------	--	--	--	--

In order to identify the needs of the groups, you will need to review data, statistics, user feedback, population data, complaints data, staffing data (SAPHRreports@iow.gov.uk), community/client data, feedback from focus groups etc. When assessing the impact, the assessment should come from an evidence base and not through opinion or self-knowledge.

H. Review

How are you engaging people with a wide range of protected characteristics in the development, review and/or monitoring of the programme/ activity?

Engagement has been through various forms of public consultation to date – including physical surveys, online forms, drop-in events for each affected school. There will be individual consultation with relevant staff and this impact assessment will be reviewed with any new information.

Date of next review:

H. Sign-off

Head of Service/Director/Headteacher sign off & date:

Name:
Date:

Legal sign off & date:

Name:
Date: