

# Equality Impact Assessment Form for Vale of Berkeley College

## Part 1: Initial Screening

### 1. Persons responsible for this assessment:

<b>Name:</b> Lynn Morris	<b>Telephone:</b> 01452 426543
<b>Service:</b> Access Commissioning	<b>E-Mail:</b> .uk
<b>Directorate:</b> Children and Young People's Directorate	<b>Date of Assessment:</b> February 2010 <b>Date of review:</b> June 2010

### 2. Name of the policy, service, strategy, procedure or function:

Implementation of the government's recommendation for Gloucestershire's National Challenge schools

**Option 1** Closure of The Vale of Berkeley College with effect from September 2010

**Option 2** Forming a hard federation between Vale of Berkeley College and a strong neighbouring school such as Katharine Lady Berkeley or Rednock.

During the consultation process, the school proposed an alternative option of a Co-operative Trust Community School. This proposal was included in the governor's formal response to the consultation.

On 10 February, Cabinet decided to defer the decision on whether to close Vale of Berkeley College to a meeting in June to enable:

- a A full and detailed analysis of the Co-operative Trust proposal presented by the school
- b Further analysis of where students who currently attend Vale of Berkeley College would transfer if a decision is taken to close the school.

The impact of this deferral is that should a decision be made to close the school, the implementation would be for September 2011, and not for September 2010.

**Is this new or an existing one?** new

### 3. Briefly describe its aims and objectives

Vale of Berkeley College is one of nine schools in the government's National Challenge programme, which aims to ensure that more than 30% of students at all secondary schools will achieve the target of five good GCSE grades at Grade C or above, including English and maths

by 2011.

Although the school has exceeded the 30% threshold for the last two years (31% in 2009 and 34% in 2008), the school performs poorly compared with other Gloucestershire schools and against national benchmarks on a number of indicators:

- There is a very small number of students on roll ( 274 in September 2009 against 449 places), limiting the curriculum on offer
- there is a very low level of parental preference for the school and this is falling ( 36 first preferences in September 2009)
- levels of unauthorised absence are high ( nearly 10% in 2008/09)
- The gap between the achievement of students at VOBC with SEN and those without is higher than the Gloucestershire average
- when the academic results are contextualised, the school achieves significantly below the national and the county average. This means that compared with similar schools across the country and taking into account prior attainment, gender, free school meals, deprivation the school performs less well.
- the cost of providing an education for each pupil is high, £5,529 against a county averaging against other schools at around £3,400
- The National challenge Advisor has identified the school as being at severe risk of not achieving the government's target in 2011.

The Badman report on the school in September 2009 made a single recommendation for the closure of the school. The **aim of this would be to ensure that in September 2010:**

- all students, including those with SEN, would be attending schools where they could perform better
- all students, including those with SEN, would be attending schools where they would have a better and wider curriculum offer
- the Gloucestershire school system offered better value for money within the limited and diminishing budget that it has
- there was one fewer Gloucestershire school below the governments 2011 floor target.

The county council also consulted on a second option – that of a hard federation between the Vale of Berkeley College and a strong neighbouring school such as Katharine Lady Berkeley or Rednock. However, during the consultation period, the governors of both these schools decided that they did not wish to enter into a federation with Vale of Berkeley College.

#### 4. Who is intended to benefit from it and in what way?

- Students currently attending The Vale of Berkeley College.
- Future secondary aged children in the area.
- Pupils in all other Gloucestershire schools

## 5. What outcomes are expected?

The **outcomes we would expect are:**

- all current Vale of Berkeley students, including those with SEN, would be attending schools where they could perform better
- all students, including those with SEN, would be attending schools where they would have a better and wider curriculum offer
- the Gloucestershire school system offered better value for money within the limited and diminishing budget that it has
- no Gloucestershire secondary school below the government's 2011 floor target.

## 6. Have you consulted on this policy, service, strategy, procedure or function?

### Details of consultation

Consultation document circulated by email to statutory consultees. Copies of the consultation document were circulated to all partner primary schools plus Rednock and Katharine Lady Berkeley secondary schools.

Website consultation including separate student consultation

Information telephone line

Parent meetings at the school

Community drop-in at the school

Meetings with staff, student council, governors

The full programme of meetings is included below, and notes of meetings can be accessed on the website: [www.gloucestershire.gov.uk/nationalchallenge](http://www.gloucestershire.gov.uk/nationalchallenge)

Consultees	Dates (of meetings)
Parents / Carers at VOBC	25 <sup>th</sup> Nov 2009 26 <sup>th</sup> Nov 2009 3 <sup>rd</sup> Dec 2009
Staff at VOBC	as parents, plus 11 <sup>th</sup> Jan 2010
Governors at VOBC	as parents, plus 11 <sup>th</sup> Jan 2010 Joint mtg – 19 <sup>th</sup> Jan 2010
Students at VOBC	12 <sup>th</sup> Jan 2010
Governors / parents re Trust proposal	17 <sup>th</sup> Dec 2009
Community meetings	2 <sup>nd</sup> Dec 2009
Professional Associations (via JCF)	14 <sup>th</sup> Jan 2010
Partner Primary Schools Heads meeting	20 <sup>th</sup> Jan 2010
Meetings with Heads and CofG – KLB, Rednock, Severn Vale, Maidenhill, Beaufort, Archway and Joint meeting with Heads of school	Archway 16 <sup>th</sup> Dec, Beaufort 14 <sup>th</sup> Dec, KLB 15 <sup>th</sup> Dec, Maidenhill 17 <sup>th</sup> Dec,

	Rednock 16 <sup>th</sup> Dec, Severn Vale 16 <sup>th</sup> Dec
Ham & Stone Parish Council	25 <sup>th</sup> Jan 2010
GAPH / GASH / GASSH/ GAPH Premises GGA	19 <sup>th</sup> Jan 2010
Meeting to discuss federation with governors from Vale of Berkeley, Rednock and KLB	19 <sup>th</sup> Jan 2010

### 7. What evidence has been used for this assessment?

Local evidence includes:

- Gloucestershire Review, Graham Badman Report
- National Challenge Advisor Report
- GCC – CIRCLE (Centre for Intercultural Resources, Curriculum and Language Education) - Attainment of students with EAL and students from minority ethnic groups
- GCC – Challenge and Development - SEN Attainment of KS4 pupils with SEN

**8. Could a particular group be affected differently in either a negative or positive way?**

	<b>Negative</b>	<b>Positive</b>	<b>Neutral</b>	<b>Evidence</b>
<b>Age</b>			√	The proposals do not offer the potential for discrimination or disproportionate treatment in relation to age.
<b>Disability / SEN</b>		√		<p>Vale of Berkeley College has 20.1% of pupils on School Action, 4% on School Action plus and 9.9% with SEN statements. This means that nearly 34% of pupils have recognised SEN.</p> <p>Local authority analysis suggests that 60% of Gloucestershire's comprehensive schools are attaining better with pupils with SEN than VOBC, despite the intensive 1:1 support and small classes at the school.</p> <p>It is proposed for Vale of Berkeley College to close with effect from 1 September 2011. Parents of Y7 and Y9 pupils have been offered the option to transfer to alternative schools for September 2010 if they so wish.</p> <p>The plan for students currently in Years 8 &amp; 9 is to work with parents and carers during the autumn term to secure alternative places for the 2011 academic year, following the proposed closure of Vale of Berkeley College.</p> <p>Detailed analysis of the needs of individual pupils with SEN has already been carried out from a specially commissioned SEN specialist in discussion with the SENCO from VOBC. The review concluded that the needs of these students could be met by provision available at other schools. The nature of support will vary from child to child and will be dependent on the arrangements in place in individual schools. However, the LA has recognised that for some students with ASD needs across the county, further specialist provision needs to be developed. The Schools' Forum has agreed to fund the development of specialist ASD provision across a number of mainstream secondary schools in the County and so needs</p>

				<p>of VOBC students will be met through this development</p> <p>The Advisory Teachers Service and SEN casework team will review the cases of all pupils on School Action+ and those with Statements of Special Educational Need</p> <p>The proposals do not offer the potential for discrimination or disproportionate treatment in relation to disability. On the contrary, it is considered that these proposals will have a positive impact on the standard, quality and range of provision for pupils with Special Educational Needs and should lead to improved pupil progress, enhanced confidence and well-being.</p> <p><b>See Annex 1</b></p>
<b>Gender including Transgender</b>			√	The proposals do not offer the potential for discrimination or disproportionate treatment in relation to gender.
<b>Race including Gypsy and Traveller</b>			√	The proposals do not offer the potential for discrimination or disproportionate treatment in relation to race.
<b>Religion or Belief</b>			√	The proposals do not offer the potential for discrimination or disproportionate treatment in relation to religion or belief.
<b>Sexual orientation</b>				Not applicable
<b>Other groups</b>				Not applicable

<p><b>Community cohesion</b></p>	<p><b>Describe how the proposed activity, policy, strategy, service, procedure or functions will contribute to Community Cohesion.</b></p> <p><b>You will need to consider;</b></p> <ul style="list-style-type: none"> <li>• <b>is there equality between those who will and won't benefit from the proposal</b></li> <li>• <b>are there strong relationships between groups and communities in the area affected and will the proposed action promote positive relationships</b></li> <li>• <b>does the proposal bring groups/ communities into increased contact with each other</b></li> </ul>	<p>The potential impact of closure of Vale of Berkeley College (VOBC) on the local community has been raised and noted during the course of the consultation.</p> <p>Where a rural primary school is proposed to close, guidance from the DCSF to the Decision-Maker states that those proposing closure should provide evidence to show they have carefully considered:</p> <ul style="list-style-type: none"> <li>• Alternatives to closure, including federation with another local school to increase the school's viability, the scope for the school to provide extended services for the community etc.</li> <li>• The transport implications.</li> <li>• The overall and long term impact on local people and of the loss of the building as a community facility.</li> </ul> <p>This guidance is not applicable to secondary schools, however the DCSF guidance to local authorities and governing bodies advises that in the case of secondary schools, it is the responsibility of the Decision-Maker to decide whether a school is to be regarded as rural for the purpose of considering proposals for closure. The Department's register of schools – Edubase – includes a rural/urban indicator for each school.</p> <p>In connection with the DCSF guidance, although VOBC has a rural indicator on Edubase, it need not be regarded as rural for the purpose of considering to close the school. This is because although it is located in the rural Berkeley Vale, approximately 50% of the pupils attending the school live in Cam, Dursley and Gloucester as shown on the pupil map attached as Annex 2 to this paper. If however, the view is taken that VOBC should properly be regarded as a rural school for this purpose, then the following considerations are relevant:</p> <ul style="list-style-type: none"> <li>• VOBC governors have proposed an alternative option to establish a Co-operative Trust. Cabinet Members may decide to consider this option before taking any final decisions on a proposal to close the school.</li> </ul>
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		<ul style="list-style-type: none"> <li>• The LA has consulted on the possibility of federation with strong local school as a possible alternative to closure. A briefing meeting was held for governors of Katharine Lady Berkeley (KLB), Rednock and VOBC. Subsequently the governing bodies of KLB and Rednock have decided that they do not wish to enter into a federation or to be included at this time in the proposals being made by VOBC governors to establish a Trust.</li> <li>• The main community facility on the school site is the Vale of Berkeley Sports Centre currently managed by Stroud District Council by means of a Joint Use agreement with the school. However due to financial pressures facing the Council, on 28 January, Stroud District Council Cabinet agreed to make a recommendation to issue a notice of intent to terminate the Joint Use Agreement and to return Vale of Berkeley Sports Centre back to VOBC on 31 March 2011. Formal consultation will take place with GCC in February and March 2010 before a final decision in April 2010. It is clear that the level of community support and financial viability of maintaining this community provision will also need to be considered by Members of the county council as part of their decision making process on the future of VOBC.</li> <li>• Approximately 50% of pupils attending the school do not live in the rural Berkeley Vale but travel from Cam, Dursley and Gloucester. For these pupils, there are other schools nearer to their home addresses, and other opportunities for pupils and families to access community services and facilities nearer to their homes.</li> <li>• VoB College is not the school of choice for the majority of parents living within its catchment. Jan 2010 figures show:  Of the 204 pupils in years 7 to 11 living in Berkeley ward 101 attend Vof B and 103 attend other schools including 46 to Rednock and 45 to KLB. The southern part of the catchment also includes the Vale ward but of the 102</li> </ul>
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secondary pupils just 15 attend Vof B, 52 attend KLB and 22 Rednock. The northern part of the catchment includes Slimbridge parish. There are 62 pupils in Years 7 to 11, of which 13 attend VoB and 49 attend other schools including 34 to Rednock and 4 to KLB.

- If the school closes there will be transport implications. The nearest alternative school to VOBC for pupils living in/around Berkeley, Sharpness and Wanswell will be more than 3 miles from their home address and in line with current county council transport policy, pupils will be entitled to free home to school transport.
  - In the short term this is likely to increase the number of buses running from Berkeley to other schools. However, this will be mitigated by a reduction in the number of buses/minibuses and other forms of transport needed to bring pupils from Cam, Dursley and Gloucester to VOBC.
  - In the short term, also, there may be an impact on transport for VOBC pupils who live outside the local areas and who would need to have places at alternative schools. However it is not possible to assess the impact until alternative admissions arrangements have been agreed.
  - In the longer term, transport to some alternative schools may be reduced as new Year 7 pupils are naturally allocated their nearest school and do not have to travel to schools further afield.
- There is the likelihood of some job losses, if the school closes, although where possible, the county council would seek to identify continuing employment opportunities for staff at the school and GASH have agreed in principle to work with the county council to support deployment of VOBC staff where possible.
- Since about half of the pupils and families do not live in the town of Berkeley,

		<p>Sharpness or in the village of Wanswell where VOBC is situated, the school may not be considered to be at the heart of its community and so the impact on the community is likely to be less significant than would otherwise be the case. If the school closes, alternative educational and other uses would be considered prior to any decisions about possible disposal of the site, and there are restrictions on the disposal of playing fields.</p> <p><b>See Annex 2</b></p>
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**9. If you have identified a negative impact in Question 8 complete this section**

<p><b>Are there any other policies, services, strategies, procedures or functions that need to be assessed alongside this screening?</b></p> <p><b>If Yes, please identify which groups are affected</b></p>
<p><b>Should the policy, service, strategy, procedure or function proceed to a full Equality Impact Assessment?</b></p> <p><b>No</b></p>
<p><b>If the answer is no please give reasons for this decision</b></p> <p><b>The assessment concludes that there are no negative impacts for equality issues which will result from these proposals.</b></p>
<p><b>Date by which full Equality Impact Assessment is to be completed</b></p> <p><b>June 2010</b></p>

**Declaration**

**We are satisfied that an initial screening has been carried out on this policy, service, strategy, procedure or function \* (delete those which do not apply) and a full Equality Impact Assessment is / is not required.**

**We understand that the Equality Impact Assessment is required by the County Council and that we take responsibility for the completion and quality of this assessment**

**Completed by: L. Morris**

**Date: February 2010 and June 2010**

**Role: Senior Forward Planning and Review Manager**

**Countersigned by Head of Service**

**Jo Grills, Director for Learning and Development**

**Date: 28 June 2010**

**Date for Review: Prior to publication of statutory notices if applicable**

**Updated June 2010 following 16 June Cabinet decision to publish statutory notices.**

**Please forward an electronic copy to the Equalities Team by emailing**

The original signed hard copy and electronic copy should be kept with your team for audit purposes.

## Annex 1

### ATTAINMENT OF KS4 PUPILS WITH SEN AT VALE OF BERKELEY SCHOOL 2009

This analysis is based upon data related to pupils with and without special educational needs (SEN) at the School Action, School Action Plus and Statemented levels of intervention in these categories:

- 5+ A\*-C including English and mathematics
- 5+ A\*-G including Level 1 English and mathematics
- 3 levels of progress (3LP) from Y7 in English, mathematics and science

At the end of Key Stage 4 in 2009 Vale of Berkeley School had:  
 37 pupils with no special educational need (18 male; 19 female)  
 12 pupils at school action (8 male; 4 female)  
 1 pupil at school action plus (male)  
 2 pupils with statements (both male)

The tables below focus upon the previously stated five key areas of attainment and progress for pupils without SEN and those at different levels of intervention. In thirty-three of the forty-one aspects where judgements can be made the attainment of the school's pupils with SEN is below the average for all mainstream schools in the local authority. In addition two of the aspects in which the school appears to attain better than the local authority concern the gap between non-SEN and SEN pupils achieving 5+ A\*-C GCSEs. But given that none of the school's pupils with SEN achieved that then the gap, as a criterion of success, is spurious.

#### 5+ A\*-C incl. English and mathematics

	NO NEED	SCH ACTION	SCH ACTION+	STATEMENTS	ALL SEN GAP
LA M'STREAM – ALL	67.9	13.8	11.3	10.6	54.9
LA M'STREAM – FEMALE	70.3	15.0	5.0	10.7	57.1
LA M'STREAM – MALE	65.4	13.1	14.3	10.6	52.5
V of B – ALL	43.2 K+ R+	0.0 (K+ R=)	0.0 (K+ R+)	0.0 (R=)	43.2
V of B – FEMALE	57.9 K+ R+	0.0 (K+)	N/A	N/A	57.9

V of B – MALE	27.8 K+ R+	0.0 (K+ R=)	0.0 (K+ R+)	0.0 (R=)	27.8
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### 5+ A\*-G incl. Level 1 English and mathematics

	NO NEED	SCH ACTION	SCH ACTION+	STATEMENTS	ALL SEN GAP
LA M'STEAM – ALL	98.0	83.4	64.5	65.9	19.6
LA M'STEAM – FEMALE	98.4	83.4	53.3	64.3	20.8
LA M'STEAM – MALE	97.7	83.5	69.8	66.3	18.7
V of B – ALL	97.3 (K+ R+)	75.0 (K+ R-)	0.0 (K+ R+)	50.0 (R-)	30.6
V of B – FEMALE	100.0 (K- R-)	75.0 (K+)	N/A	N/A	25.0
V of B – MALE	94.4 (K+ R+)	75.0 (K+ R-)	0.0 (K+ R+)	50.0 (R+)	30.8

### 3 Levels of Progress - English

	NO NEED	SCH ACTION	SCH ACTION+	STATEMENTS
LA M'STEAM – ALL	78.2	40.3	32.9	46.9
LA M'STEAM – MALE	73.7	39.0	34.9	45.7
LA M'STEAM – FEMALE	82.6	42.5	42.5	52.9
V of B – ALL	40.5 (K+ R+)	25.0 (K+ R+)	0.0 (K+ R+)	0.0 (R+)
V of B – MALE	38.9 (K+ R+)	25.0 (K+ R+)	0.0 (K+ R+)	0.0 (R+)
V of B – FEMALE	42.1 (K+ R+)	25.0 (K+)	n/a	n/a

### 3 Levels of Progress - Mathematics

	NO NEED	SCH ACTION	SCH ACTION+	STATEMENTS
LA M'STEAM – ALL	75.0	34.5	26.2	32.4
LA	75.0	36.7	32.7	33.0

M'STREAM – MALE				
LA M'STREAM – FEMALE	76.0	30.7	13.8	29.4
V of B – ALL	51.4 (K+ R+)	58.3 (K- R-)	0.0 (K+ R+)	100.0 (R-)
V of B – MALE	50.0 (K+ R+)	62.5 (K- R-)	0.0 (K+ R+)	100.0 (R-)
V of B – FEMALE	52.6 (K+ R+)	50.0 (K-)	N/A	N/A

### 3 Levels of Progress - science

	NO NEED	SCH ACTION	SCH ACTION+	STATEMENTS
LA M'STREAM – ALL	69.5	25.9	23.4	30.1
LA M'STREAM – MALE	68.8	27.3	27.2	31.5
LA M'STREAM – FEMALE	70.1	23.6	15.8	23.8
V of B – ALL	48.6 (K+ R+)	33.3 (K+ R-)	0.0 (K+ R+)	0.0 (R=)
V of B – MALE	50.0 (K+ R+)	25.0 (K+ R-)	0.0 (K= R+)	0.0 (R=)
V of B – FEMALE	47.4 (K+ R+)	50.0 (K-)	N/A	N/A

Local authority analysis suggests that 60% of Gloucestershire's comprehensive schools are attaining better with pupils with SEN than Vale of Berkeley College.

## Annex 2: Map to show where VOBC pupils live.

