

## **Appendix B: Equality Impact Assessment Including Socio Economic Duty**

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance, please contact the Diversity and Inclusion Team on 01443 444529.

An Equality Impact Assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective, and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the:

- Well-being of Future Generation (Wales) Act 2015.

The 'A More Equal Wales – Mapping Duties' guide highlights the alignment of our duties in respect of the above-mentioned legislation.

## SECTION 1 – PROPOSAL DETAILS

**Lead Officer:** Lisa Howell

**Service Director:** Andrea Richards

**Service Area:** Directorate of Education and Inclusion Services, 21<sup>st</sup> Century Schools Team

**Date:** 29.11.2024

### 1.a) What are you assessing for impact?

Strategy/Plan	Service Re- Model or Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
X				

### 1.b) What is the name of the proposal?

The proposal is to close the sixth form at Mountain Ash Comprehensive School (MACS) with pupils transferring to Aberdare Community School (ACS).

### 1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

The proposal is to close the sixth form at MACS and amend the catchment area for post-16 provision to place MACS in the catchment area of ACS. It is proposed that the sixth form at MACS closes by no later than September 2026. To enable the closure of the sixth form at MACS by this date, no new year 12 sixth form pupils would be admitted in September 2025.

The proposal is made in accordance with the Welsh Government's (WG's) School Organisation Code (2<sup>nd</sup> Edition) (011/2018). Section 2.3 of the WG's School Organisation Code (2<sup>nd</sup> Edition) (011/2018) refers to elements of school organisation that require the publication of proposals, including:

- Regulated alterations to community, foundation, voluntary schools and community special schools:
  - The introduction of, or ending of, sixth form provision at a school.

1.d) **Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.**

Powers for Councils to develop school organisation proposals are governed by the:

- School Standards and Organisation (Wales) Act 2013.
- WG's School Organisation Code (2<sup>nd</sup> Edition) (011/2018).

Councils must, when exercising functions under Part 3 of the School Standards and Organisation (Wales) Act 2013, act in accordance with any relevant requirements contained in the WG's School Organisation Code (2<sup>nd</sup> Edition) (011/2018) and must have regard to any relevant guidelines contained in it.

1.e) **Please outline who this proposal affects:**

- Service users: X
- Employees: X
- Wider community: X

## SECTION 2 – SCREENING TEST: IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative, or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

### Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

PROTECTED CHARACTERISTIC	DOES THE PROPOSAL HAVE A POSITIVE, NEGATIVE, OR NEUTRAL IMPACT?	PROVIDE DETAIL OF THE IMPACT	WHAT EVIDENCE HAS BEEN USED TO SUPPORT THIS VIEW?
AGE:	Positive	<p><b><u>Young People (School Pupils)</u></b></p> <p>According to PLASC data, in January 2024 there were 899 statutory school age pupils and 82 sixth form pupils at MACS.</p> <p>The current post-16 offer in MACS is restricted and inefficient due to small class sizes. It does not provide learners with the best possible experience of sixth form education.</p> <p>Some pupils may initially be daunted at moving to a new school for sixth</p>	<p><b><u>Young People (School Pupils)</u></b></p> <p>In 2023/24:</p> <ul style="list-style-type: none"><li>• 9 courses were run for less than 5 pupils. This is inefficient and unsustainable.</li><li>• Only 11 sixth form options were run for Year 12 pupils, and 10 subject options for Year 13 pupils. This was the lowest number of subject options offered in the Cynon Valley.</li><li>• 65% of MACS pupils travelled to</li></ul>

		<p>form, however meaningful support would be offered to them to make the transition as smooth as possible, as outlined in more detail in the Community Impact Assessment. It should also be noted that the majority of MACS sixth form students already travel to ACS or St John Baptist CIW High School to access some of their studies during the school day.</p> <p>Overall, the proposal would have a positive impact on post-16 students at it would allow them to access a wider curriculum offer that would better meet their needs in a more enhanced 21<sup>st</sup> century learning environment. The need to travel between sites during the school day would be reduced, enabling students to spend more time engaging in independent learning and providing them with a more positive, settled sixth form experience, which would have a positive impact on pupil wellbeing and outcomes.</p> <p><b><u>Older People (Parents/Carers and the Wider Community)</u></b></p> <p>Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or</p>	<p>other schools to access other subject choices, compared with only 30% at ACS.</p> <p><b><u>Older People (Parents/Carers and the Wider Community)</u></b></p> <p>ACS shares facilities with Leisure Services and so it a fully operational community school. The sports facilities are used by local sporting clubs of all ages, including football, rugby and athletics boys' and girls' clubs. These facilities and the current usage will not be affected by the proposal.</p>
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		/adverse impact upon this protected group as the status quo in terms of what is currently available remains unchanged. However, should a disproportionate, /negative or /adverse impact arise, needs would be addressed, and this Equality Impact Assessment updated accordingly.	
<b>DISABILITY:</b>  <i>(People with visible and non- visible disabilities or long-term health conditions).</i>	Positive	<p>The proposal would have a positive impact on post-16 disabled learners, as ACS is fully accessible. Built in 2014, ACS was built in accordance with the requirements of planning and building control legislation and is fully accessible and compliant with the <u>Equality Act 2010</u>, and <u>The Education (School Premises) Regulations 1999</u>. There are no access barriers for pupils, staff, parents/carers, visitors and the wider community.</p> <p>ACS was designed to include flexible spaces to allow opportunities for teaching and learning in smaller groups, intervention spaces, and to provide one to one support where required. It also benefits from facilities such as dedicated hygiene/medical rooms for the use of all pupils and staff, including those with disabilities, level accesses and improved traffic management</p>	<p><b><u>MACS:</u></b> the site and school buildings <b>partly</b> comply with the <u>Equality Act 2010</u> and are graded <b>B</b> for accessibility, meaning there are some issues that require further improvement.</p> <p><b><u>ACS:</u></b> the site and school building are <b>fully</b> compliant with the <u>Equality Act 2010</u> and are graded <b>A</b> for accessibility.</p> <p><b><u>Pupils with Additional Learning Needs (ALN) and Physical Needs</u></b></p> <p><b><u>MACS:</u></b></p> <ul style="list-style-type: none"> <li>• 25 statutory school age pupils with ALN.</li> <li>• No sixth form pupils with ALN.</li> <li>• No pupils with physical needs.</li> <li>• No Learning Support Classes (LSC's) for pupils with Autistic Spectrum Disorder (ASD).</li> </ul>

		<p>arrangements.</p> <p>Should the proposal proceed, support for post 16 pupils provided by RCTCBC's Access and Inclusion Service Team would continue and would not be affected.</p> <p>The <u>ALN and Education Tribunal (Wales) Act 2018</u> requires Councils to keep arrangements for supporting pupils with ALN within their area under review and consider whether they are sufficient. As such, the need for any additional ALN LSCs at ACS will continue to be reviewed and, should there be a need for more in the future, there would be sufficient capacity to accommodate this.</p>	<p><b><u>ACS:</u></b></p> <ul style="list-style-type: none"><li>• 73 statutory school age pupils with ALN.</li><li>• 2 sixth form pupils with ALN.</li><li>• 7 pupils with physical needs.</li><li>• 2 LSC's for pupils with ASD.</li></ul>														
<p><b>GENDER REASSIGNMENT:</b></p> <p><i>(Anybody whose gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities).</i></p>	Neutral	<p>Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However, should a disproportionate, /negative or /adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.</p>	<p>The Census (2021) provides data on <b>gender identity</b>. The breakdown for RCT is provided below:</p> <table><tr><td>Same gender as birth</td><td>93.69%</td></tr><tr><td>Different gender – not specified</td><td>0.14%</td></tr><tr><td>Trans woman</td><td>0.07%</td></tr><tr><td>Trans man</td><td>0.07%</td></tr><tr><td>Non-binary</td><td>0.05%</td></tr><tr><td>All other gender identities</td><td>0.03%</td></tr><tr><td>Did not answer</td><td>5.95%</td></tr></table> <p>Research included in the</p>	Same gender as birth	93.69%	Different gender – not specified	0.14%	Trans woman	0.07%	Trans man	0.07%	Non-binary	0.05%	All other gender identities	0.03%	Did not answer	5.95%
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			International Journal of Public Health demonstrates that school washrooms have been identified by sexuality and gender diverse (SGD) pupils as the least safe spaces in schools. They are sites of verbal, physical and sexual victimisation. Providing gender neutral toilet facilities (washrooms), such as those included at ACS, can reduce the bullying and victimisation of SGD pupils, particularly those who are transgender or gender diverse.
<b>MARRIAGE OR CIVIL PARTNERSHIP:</b>  <i>(People who are married or in a civil partnership).</i>	Neutral	Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However, should a disproportionate, /negative or /adverse impact arise, needs wouldill be addressed and this Equality Impact Assessment updated accordingly.	Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However, should a disproportionate, /negative or /adverse impact arise, needs wouldill be addressed and this Equality Impact Assessment updated accordingly.
<b>PREGNANCY AND MATERNITY:</b>  <i>(Women who are pregnant/on maternity leave).</i>	Neutral	Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However,	Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However,



		should a disproportionate, /negative or /adverse impact arise, needs wouldill be addressed and this Equality Impact Assessment updated accordingly.	should a disproportionate, /negative or /adverse impact arise, needs wouldill be addressed and this Equality Impact Assessment updated accordingly.												
<b>RACE:</b>  <i>(Ethnic and racial groups i.e., minority ethnic groups, Gypsy, Roma, and Travellers).</i>	Neutral	Given the nature of the proposal, there is no evidence to suggest that the proposal would have a disproportionate/negative or /adverse impact upon this protected group as the status quo in terms of what provision is currently available remains unchanged. However, should a disproportionate, /negative or /adverse impact arise, needs wouldill be addressed and this Equality Impact Assessment updated accordingly.	<b>Racial Identity</b> data for statutory school aged pupils (PLASC 2024) is provided below:  <b>MACS:</b> <table><tr><td>White British</td><td>95.11%</td></tr><tr><td>Any other ethnic background</td><td>4.67%</td></tr><tr><td>Unknown</td><td>0.22%</td></tr></table> <b>ACS:</b> <table><tr><td>White British</td><td>93.20%</td></tr><tr><td>Any other ethnic background</td><td>6.80%</td></tr><tr><td>Unknown</td><td>0.00%</td></tr></table>	White British	95.11%	Any other ethnic background	4.67%	Unknown	0.22%	White British	93.20%	Any other ethnic background	6.80%	Unknown	0.00%
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Unknown	0.00%														
<b>RELIGION OR BELIEF:</b>  <i>(People with different religions and philosophical beliefs including people with no beliefs).</i>	Positive	If the proposal goes ahead, this could have a positive impact for this protected group as the additional flexible spaces within ACS would provide suitable environments for more post 16 pupils to engage in prayer and personal reflection as required.	ACS was built to include flexible, multi-purpose spaces.  A dedicated area was designed within ACS so that the local community and third parties can safely use the facilities at the school, both during and after the school day.												
<b>SEX:</b>  <i>(Women and men, girls, and boys).</i>	Positive	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this protected	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this protected												

		group. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.	group. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.
<b>SEXUAL ORIENTATION:</b>  <i>(Bisexual, gay, lesbian, straight).</i>	Neutral	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this protected group. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this protected group. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.

In addition, due to the Council commitments made to the following groups of people, we would like you to consider impacts upon them:

PROTECTED CHARACTERISTIC	DOES THE PROPOSAL HAVE AN POSITIVE, NEGATIVE, OR NEUTRAL IMPACTS	PROVIDE DETAIL OF THE IMPACT	WHAT EVIDENCE HAS BEEN USED TO SUPPORT THIS VIEW?
<b>ARMED FORCES COMMUNITY:</b>  <i>(Anyone who is serving, has served, family members and the bereaved).</i>	Positive	<p>The proposal would have a positive impact on this group as:</p> <ul style="list-style-type: none"> <li>Children of Armed Forces families who moved into the area would have access to a wider post-16 curriculum offer, the opportunity to study in a 21<sup>st</sup> century learning environment, and enjoy all the other benefits</li> </ul>	<ul style="list-style-type: none"> <li>Data on the number of statutory school age pupils and sixth form pupils from MACS and ACS who are children of the Armed Forces Community is currently unavailable.</li> <li>Should an Armed Forces family move to the area midway through an academic year, they would be supported by a Regional</li> </ul>

		<p>for pupils outlined in the 'Age' section above, and in the Consultation Document and Community Impact Assessment.</p> <ul style="list-style-type: none"> <li>• Parents/carers of the post 16 pupils and the wider Armed Forces community would benefit from the community facilities at ACS, which could include use by Armed Forces groups.</li> </ul>	<p>School Liaison Officer to help the children settle into their new school.</p> <ul style="list-style-type: none"> <li>• A dedicated area was designed within ACS so that the local community and third parties can safely use the facilities at the school, both during and after the school day.</li> </ul>
<p><b>CARERS:</b></p> <p><i>(Anyone of any age who provides unpaid care).</i></p>	Positive	<p>The proposal would have a positive impact on this group as:</p> <ul style="list-style-type: none"> <li>• Young carers would have access to a wider post-16 curriculum offer, the opportunity to study in a 21<sup>st</sup> century learning environment, and enjoy all the other benefits for pupils outlined in the 'Age' section above, and in the Consultation Document and Community Impact Assessment.</li> <li>• Carers of any age would benefit from the community facilities at ACS, which could include use by Carer Support groups.</li> </ul>	<ul style="list-style-type: none"> <li>• 1.5% and 0.3% of statutory school age pupils at MACS and ACS respectively, are young carers.</li> <li>• A dedicated area was designed within ACS so that the local community and third parties can safely use the facilities at the school, both during and after the school day.</li> </ul>

If the initial screening test has identified negative impacts, then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant, please provide an adequate explanation below:

**Are you happy you have sufficient evidence to justify your decision?**

<b>YES</b>	X	<b>NO</b>	
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**Name:** Lisa Howell

**Position:** 21<sup>st</sup> Century Schools Business and School Organisation Manager

**Date:** 29.11.2024

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

**PLEASE NOTE: There is a separate impact assessment for Welsh Language. This must also be completed for proposals.**

Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a 'strategic nature' is available on page 6 of the [Preparing for the Commencement of the Socio- economic Duty](#) Welsh Government Guidance.

### SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

<ul style="list-style-type: none"> <li>• Single parents and vulnerable families.</li> <li>• Pensioners.</li> <li>• Looked after children.</li> <li>• Homeless people.</li> <li>• Students.</li> <li>• Single adult households.</li> </ul>	<ul style="list-style-type: none"> <li>• People living in the most deprived areas in Wales.</li> <li>• People with low literacy and numeracy.</li> <li>• People who have experienced the asylum system.</li> <li>• People misusing substances.</li> <li>• People of all ages leaving a care setting.</li> <li>• People involved in the criminal justice system.</li> </ul>
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SOCIO-ECONOMIC DISADVANTAGE	DOES THE PROPOSAL HAVE ANY POSITIVE, NEGATIVE, OR NEUTRAL IMPACTS	PROVIDE DETAIL OF THE IMPACT	WHAT EVIDENCE HAS BEEN USED TO SUPPORT THIS VIEW?
<b>LOW INCOME / INCOME POVERTY:</b>  <i>(Cannot afford to maintain regular payments such as bills, food, clothing, transport etc.).</i>	Positive	<p>1. <b>General</b> Data suggests that both MACS and ACS serve some of the most deprived communities in Wales. Should the proposal go ahead, it will have a positive impact on all pupils, parents/carers, and members of the wider community, regardless of their socio-economic status.</p> <p>All pupils would have access a wider curriculum offer that would better meet</p>	<p>1. <b>General</b> According to the Welsh Index of Deprivation (WIMD) published in 2019, the catchment areas of both MACS and ACS include some of the most deprived areas in Wales.</p> <p><b><u>Overall Deprivation</u></b></p> <p><b>MACS:</b> Three of the small areas, known as Lower Super Output Areas (LSOA's),</p>

their needs in a more enhanced 21<sup>st</sup> century learning environment. The need to travel between sites during the school day would be reduced, enabling students to spend more time engaging in independent learning and providing them with a more positive, settled sixth form experience. This would have a positive impact on pupil wellbeing and outcomes and give all pupils, regardless of their socio-economic background, a greater chance to fulfil their potential.

## 2. Transport

It is noted that should the proposal go ahead, all post-16 pupils living in the catchment area of MACS would need to travel further to attend sixth form at ACS. However, it is highly likely that all pupils would be entitled to free home to school transport to attend ACS, therefore this would not have a negative financial impact on families.

## 3. Other Costs

Should the proposal go ahead, it is acknowledged that there may be cost implications for pupils transferring to ACS for post-16 provision, including the need to purchase new school uniforms. However, help is available to families, including pre-loved uniform schemes and weekly EMA payments for students from low-income households to help with the

within the MACS catchment area are ranked in the top 10% most deprived areas in Wales. This includes the Penrhiwceiber 1 LSOA, which is ranked as the 6<sup>th</sup> most deprived area in Wales and the second most deprived area in RCT.

LSOA	Wales ranking (of 1909 LSOA's)	RCT ranking (of 154 LSOA's)
Penrhiwceiber 1	6	2
Abercynon 2	33	5
Mountain Ash West 2	136	19

**ACS:** Three of the LSOA's within the ACS catchment area are ranked in the top 10% most deprived areas in Wales. This includes the Penywaun 2 LSOA, which is ranked as the 15<sup>th</sup> most deprived area in Wales and the third most deprived area in RCT.

LSOA	Wales ranking	RCT ranking
Penywaun 2	15	3
Penywaun 1	101	12
Hirwaun 3	176	25

## Income Deprivation

costs of further education.

4. **Community Use**

There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon the community given this proposal would not affect the status quo, and the provision already offered. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.

**MACS:** Three of the LSOA's within the MACS catchment area are ranked in the top 10% most income-deprived areas in Wales. This includes the Penrhiwceiber 1 LSOA, which is ranked as the 12<sup>th</sup> most income-deprived area in Wales and the second most income-deprived area in RCT.

LSOA	Wales ranking	RCT ranking
Penrhiwceiber 1	12	2
Abercynon 2	53	6
Mountain Ash West 2	78	8

**ACS:** Four of the LSOA's within the ACS catchment area are ranked in the top 10% most income deprived areas in Wales. This includes the Penywaun 2 LSOA, which is ranked as the 26<sup>th</sup> most income-deprived area in Wales and the third most income-deprived area in RCT.

LSOA	Wales ranking	RCT ranking
Penywaun 2	26	3
Penywaun 1	130	15
Hirwaun 3	141	17
Aberaman North 2	185	25

2. **Transport**

Following a recent public consultation



			<p>exercise, RCTCBC's <u>Cabinet</u> has determined that from September 2025:</p> <ul style="list-style-type: none"> <li>• RCTCBC will adopt the statutory distance criteria set out in the WG's <u>Learner Travel (Wales) Measure 2008</u> in relation to secondary age pupils (year 7 to 11), and provide free home to school transport for all secondary pupils residing <b>3 miles</b> or further from their nearest suitable school.</li> <li>• RCTCBC will continue, at its discretion, to provide transport for post-16 pupils who reside <b>3 miles</b> or further from their nearest suitable school or college.</li> </ul> <p>Further information in relation to RCTCBC's Home to School Transport provision is included in the Consultation Document and is available on the RCTCBC website.</p> <p><b>3. Other Costs</b></p> <ul style="list-style-type: none"> <li>• ACS operate a pre-loved uniform scheme, and so any post-16 pupil can receive assistance with uniform from the school.</li> <li>• Pupils may be eligible to receive Education Maintenance Allowance (EMA); a weekly payment of £40 to help 16 to 18 year olds with the costs of further education. Eligibility is based on household income.</li> </ul>
<b>LOW AND/OR NO</b>	Positive	As 'Low Income / Income Poverty' section	As 'Low Income / Income Poverty' section

<b>WEALTH:</b>  <i>(Enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future).</i>		above.	above.
<b>MATERIAL DEPRIVATION:</b>  <i>(Unable to access basic goods and services i.e., financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.).</i>	Positive	As 'Low Income / Income Poverty' section above.	As 'Low Income / Income Poverty' section above.
<b>AREA DEPRIVATION:</b>  <i>(Where you live (rural areas), where you work (accessibility of public transport)).</i>	Neutral	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this socio-economic disadvantage given this proposal would not affect the status quo, and the provision already offered. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.	There is no evidence to suggest that the proposal would have a disproportionate, negative or adverse impact upon this socio-economic disadvantage. However, should a disproportionate, negative or adverse impact arise, needs would be addressed and this Equality Impact Assessment updated accordingly.
<b>SOCIO-ECONOMIC</b>	Positive	As 'Low Income / Income Poverty' section above.	As 'Low Income / Income Poverty' section above.

<b>BACKGROUND:</b>  <i>(Social class i.e., parents' education, employment, and income).</i>			
<b>SOCIO-ECONOMIC DISADVANTAGE:</b>  <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged).</i>	Positive	As 'Low Income / Income Poverty' section above.	As 'Low Income / Income Poverty' section above.

#### SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. Attach a separate action plan where impacts are substantial.**

There is no evidence to suggest that the proposal will have a disproportionate/negative/adverse impact on a protected group.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.**

There is no evidence to suggest that the proposal will have a disproportionate/negative/adverse impact on a protected group.

**4.c) Give sufficient detail of data or research that has led to your reasoning, particularly the sources used for establishing the demographics of service users/staff.**

- Data analysis is based on data derived from the Census (2021), PLASC (2024) and WIMD unless otherwise stated.
- Qualitative reasoning gathered from RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team.
- Qualitative reasoning gathered from RCTCBC's Corporate Estates Team.
- Delivery of new school buildings previously throughout RCT and their positive impact on pupils, parents/carers, staff and the wider community. These positive impacts can be requested via RCTCBC's 21<sup>st</sup> Century Schools Team.

**4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.**

The consultation will start on 2<sup>nd</sup> December 2024 and will be completed at 17:00 on 17<sup>th</sup> January 2025.

Face to face meetings will be arranged with the School Councils, Governing Bodies and staff and the wider communities of MACS and ACS.

A Consultation Response Form will be available at on RCTCBC's website on the 'Get Involved' page. The Consultation Response Form enables consultees to indicate if they wish to be notified of the publication of the Consultation Report, once presented to RCTCBC's Cabinet.

Consultees are also welcome to put their views, comments, and any questions in writing to:

Director of Education and Inclusion Services  
21<sup>st</sup> Century Schools  
Valleys Innovation Centre  
Navigation Park  
Abercynon  
CF45 4SN

Or

E-mail: [schoolplanning@rctcbc.gov.uk](mailto:schoolplanning@rctcbc.gov.uk)

Children and young people have a right to express their views in all matters affecting them and for their views to be heard and considered in accordance with their age and maturity. As such, RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team will ensure that suitable arrangements are made to involve children and young people as active participants throughout this consultation process, and if a decision is made to progress the proposal, throughout the implementation process.

A drop-in session will also be arranged so that members of the public can discuss the proposal with Officers from RCTCBC's Directorate of Education and Inclusion Services and provide any feedback at the session.

RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team will monitor the proposal.

**4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?**

YES	X	NO	
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## SECTION 5 – MONITORING AND REVIEW

### 5a) Please outline below how the implementation of the proposal will be monitored:

The proposal is made in accordance with the Welsh Government's (WG's) School Organisation Code (2<sup>nd</sup> Edition) (011/2018). Section 2.3 of the WG's School Organisation Code (2<sup>nd</sup> Edition) (011/2018) refers to elements of school organisation that require the publication of proposals, including:

- Regulated alterations to community, foundation, voluntary schools and community special schools:
  - The introduction of, or ending of, sixth form provision at a school.

The consultation will start on 2<sup>nd</sup> December 2024 and will be completed at 17:00 on 17<sup>th</sup> January 2025.

Face to face meetings will be arranged with the School Councils, Governing Bodies and staff and the wider communities of MACS and ACS.

A Consultation Response Form will be available at on RCTCBC's website on the 'Get Involved' page. The Consultation Response Form enables consultees to indicate if they wish to be notified of the publication of the Consultation Report, once presented to RCTCBC's Cabinet.

Consultees are also welcome to put their views, comments, and any questions in writing to:

Director of Education and Inclusion Services  
21<sup>st</sup> Century Schools  
Valleys Innovation Centre  
Navigation Park  
Abercynon  
CF45 4SN

Or

E-mail: [schoolplanning@rctcbc.gov.uk](mailto:schoolplanning@rctcbc.gov.uk)

Children and young people have a right to express their views in all matters affecting them and for their views to be heard

and considered in accordance with their age and maturity. As such, RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team will ensure that suitable arrangements are made to involve children and young people as active participants throughout this consultation process, and if a decision is made to progress the proposal, throughout the implementation process.

A drop-in session will also be arranged so that members of the public can discuss the proposal with Officers from RCTCBC's Directorate of Education and Inclusion Services and provide any feedback at the session.

RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team will monitor the proposal.

**5b) When is the evaluation of the proposal due to be reviewed?**

The consultation will start on 2<sup>nd</sup> December 2024 and will be completed at 17:00 on 17<sup>th</sup> January 2025. Feedback from the consultation will be collated and summarised, and a Consultation Report presented to RCTCBC's Cabinet during February 2025. This Consultation Report will be available for all persons to view on RCTCBC's website, and copies can be obtained on request from the above address.

RCTCBC's Cabinet will consider the Consultation Report and decide, based on the feedback, whether to proceed with the proposal, amend the proposal or not proceed with the proposal. If RCTCBC's Cabinet decides not to proceed, that will be the end of the proposal.

If RCTCBC's Cabinet decides to proceed with the proposal, a Statutory Notice will be published providing a 28-day notice period for objections. The School Standards and Organisation (Wales) Act 2013 requires that anyone wishing to make objections to a school organisation proposal can do so. To be considered as statutory objections, objections **must** be made in writing or by email and sent to RCTCBC within 28 days of the date on which the Statutory Notice was published.

RCTCBC's Cabinet will consider the outcome of the Statutory Notice at the next available Cabinet meeting and determine the proposal.

If there are objections, RCTCBC's Director of Education and Inclusion Services will publish an Objection Report providing a summary of the objections and the response to them within seven days of the determination of the proposal. This Objection Report will also be available for all persons to view on RCTCBC's website, and copies can be obtained on request from the above address. Under Section 50 of the School Standards and Organisation (Wales) Act 2013, proposals that affect sixth form education require approval by the Welsh Ministers. As such, RCTCBC must notify Welsh Ministers within 35 days of the end of

the Statutory Notice period and forward to them copies of any objections along with an Objection Report (where necessary). Welsh Ministers will then decide whether to proceed with the proposal, amend the proposal or not proceed with the proposal.

If the Welsh Ministers approve the proposal, it will be implemented in accordance with the date stated in the Statutory Notice or any subsequently modified date. If the Welsh Ministers decide not to proceed, that will be the end of the proposal.

**5c) Who is responsible for the monitoring and review of the proposal?**

Officers from RCTCBC's 21<sup>st</sup> Century Schools Team within the Directorate of Education and Inclusion Services will monitor the proposal.

**5d) How will the results of the monitoring be used to develop future proposals?**

All school reorganisation proposals undergo a 'Lessons Learnt' review once completed. The outcomes of the proposal (both positive and negative) will inform decisions made on future proposals.



## SECTION 6 – REVIEW

As part of the Impact Assessment process all proposals that fall within the definition of ‘Key Decisions’ must be submitted to the Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your proposal is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Decision, please forward your impact assessment to [Councilbusiness@rctcbc.gov.uk](mailto:Councilbusiness@rctcbc.gov.uk) for a Review Panel to be organised to discuss your proposal. The Equality Impact Assessment guidance document provides more information on what a Key Decision is.

It is important to keep a record of this process so that you can demonstrate how you have considered equality and socio-economic outcomes. Please ensure you update the relevant sections below.

OFFICER REVIEW PANEL COMMENTS	DATE CONSIDERED	DESCRIPTION OF (ANY) AMENDMENTS MADE FOLLOWING OFFICER REVIEW PANEL
<ul style="list-style-type: none"><li>Age and Disability Sections are noted as positive and although there will be long term positive outcomes, the consultation feedback suggests there will be a short term negative impact in terms of coping with the change.</li><li>Consultation feedback talks of the negative impact on pupils travelling. Is there an opportunity to include positive examples from similar decisions in other areas.</li><li>Include staff data for transparency – if the data is complex and there’s no evidence regarding staff impact, there is opportunity to include a more general statement on the annual staffing exercise.</li></ul>	04.02.2025	<p><b>Age – Impact on Pupils</b></p> <p>The well-being of all pupils has been considered and is paramount to RCTCBC. We acknowledge that some pupils may find the changes more difficult than others.</p> <p>Life transitions are significant features in all young people’s lives. All pupils receiving education will experience all periods of change and adaptation and many learners are already accessing their education across more than one school site and have adjusted well to this. It could be argued that receiving post-16 education on a reduced number of school sites will bring greater stability to learners and continuity in teaching and learning, and social relationships with staff and peers during</p>

		<p>their post 16 studies.</p> <p>It is acknowledged that some pupils will need additional support emotionally to adapt to a new school environment and encouragement to make new friends and relationships and to be part of a new social network.</p> <p>Should the proposal be implemented, RCTCBC will work with both schools to support the meaningful delivery of effective transition. The transition arrangements that will be delivered, will ensure there will be lots of opportunities to help pupils navigate the change and happily settle into their new school as quickly as possible.</p> <p><b>Disability</b></p> <p>All pupils with ALN will continue to be supported. <u>The Additional Learning Needs Education Tribunal (ALNET) Act 2018</u> provides detailed guidance on the duties and responsibilities of Councils in meeting the ALN of children and young people.</p> <p><u>The ALN Code for Wales (2021)</u> recommends that early years and school settings adopt a graduated response to meeting the ALN of children and young people. A graduated response means that progressively greater expertise and support can be brought in to address the difficulties a child or young person may be</p>
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		<p>experiencing. Additional or different provision should be made depending on the severity of the child/young person's level of need.</p> <p>This duty and responsibility in this regard will be met regardless of which school a child/young person attends.</p> <p><b>Travelling</b> Information in relation to RCTCBC's Home to School Transport provision is available on the RCTCBC website.</p> <p>Should the proposal proceed, it is highly likely that all sixth form pupils living in the catchment area of Mountain Ash Comprehensive School <b>will be entitled</b> to free home to school transport to attend post-16 education at Aberdare Community School.</p> <p><b>Impact on Staff</b> RCTCBC has well established Human Resource (HR) policies and procedures that give reassurance to staff and employers about the management of organisational change.</p> <p>Officers from HR attended both meetings held with staff and governors from both schools, and support will be available for all staff that require it to consider their options.</p>
<b>CONSULTATION COMMENTS</b>	<b>DATE CONSIDERED</b>	<b>BRIEF DESCRIPTION OF (ANY)</b>

		<b>AMENDMENTS MADE FOLLOWING CONSULTATION</b>
<p>In accordance with the Equality Act 2010 and the Public Sector Equality Duties, RCTCBC has a legal duty to look at how its decisions impact on people because they may have particular characteristics. So as part of seeking views on the proposal, the consultation also included the following question:</p> <p>1. How would the proposal affect you because of your:</p> <ul style="list-style-type: none"> <li>• Sex.</li> <li>• Age.</li> <li>• Ethnicity.</li> <li>• Disability.</li> <li>• Sexuality.</li> <li>• Religion/Belief.</li> <li>• Gender Identity.</li> <li>• Relationship Status.</li> <li>• Pregnancy.</li> <li>• Preferred Language.</li> </ul> <p>Of those respondents that answered this question, the majority, 60.0%, commented that the proposal would have an impact on the age characteristic and 51.0% commented that the proposal would have an impact on the disability characteristic.</p>	27.01.2025	<p>Of those respondents that commented that the proposal could negatively impact them due to their age, reasons for the negative impact included:</p> <ul style="list-style-type: none"> <li>• “I have a daughter, who is keen to finish her education within Mountain Ash Comprehensive School.</li> <li>• “We are asking pupils to make an even greater decision at 16 years of age. Not only are [we] asking them to choose subjects that will affect future life choices, but they will be making this decision on the venue too.”</li> </ul> <p>Of those respondents that commented that the proposal could negatively impact them due to their disability, reasons for the negative impact included:</p> <ul style="list-style-type: none"> <li>• “[My] child has [ALN], changing school at that stage would be impossible for her.”</li> <li>• “[My child has ALN], would mean completely changing routine and familiarity and also putting [them] at danger due to increased travelling and being in a busy town centre with main roads and more people.”</li> <li>• I have autism like many others who still attend [Mountain Ash Comprehensive] School. The closing of the sixth form</li> </ul>

		<p>would cause me to end my education because I wouldn't be able to cope with the change in environment.”</p> <p>All pupils with ALN will continue to be supported. <u>The Additional Learning Needs Education Tribunal (ALNET) Act 2018</u> provides detailed guidance on the duties and responsibilities of Councils in meeting the ALN of children and young people.</p> <p><u>The ALN Code for Wales (2021)</u> recommends that early years and school settings adopt a graduated response to meeting the ALN of children and young people. A graduated response means that progressively greater expertise and support can be brought in to address the difficulties a child or young person may be experiencing. Additional or different provision should be made depending on the severity of the child/young person's level of need.</p> <p>This duty and responsibility in this regard will be met regardless of which school a child/young person attends.</p>
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## **SECTION 7 – SUMMARY OF IMPACTS FOR THE PROPOSAL**

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

In summary, the Equality Impact Assessment identifies both positive and neutral impacts, and no negative impacts upon the protected characteristics. The proposal could bring positive socio-economic impacts across all of the vulnerable groups identified under the socio-economic disadvantage headings.

## SECTION 8 – AUTHORISATIONS

### Lead Officer:

**Name:** Lisa Howell

**Position:** 21<sup>st</sup> Century Schools Business and School Organisation Manager

**Date:** 29.11.2024

I recommend that the proposal:

Is implemented with no amendments.	X
Is implemented taking into account the mitigating actions outlined.	
Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage.	

### Head of Service/Director:

**Name:** Andrea Richards

**Position:** Service Director – 21<sup>st</sup> Century Schools and Transformation

**Date:** 29.11.2024

Please submit this impact assessment with any SLT/Cabinet Reports.