

Please click on headings to find [general guidance](#) or section guidance with an example.

You will find supporting information in appendices at the end of the guidance.

When you start to assess your proposal, arrange to meet Tim Greaves, Equality Co-ordinator, for specific guidance. Send the completed form to him for a final check and so that he can publish it on our Vale of Glamorgan equality web pages.

Please also contact Tim Greaves if you need this equality impact assessment form in a different format.

## 1. [What are you assessing?](#)

Consultation on the proposal to establish a new school building for St Richard Gwyn High school and increase its capacity from 813 places to 1,050 places from September 2025
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## 2. [Who is responsible?](#)

<b>Name</b>	Lisa Lewis	<b>Job Title</b>	Operational Manager, Strategy & Resources
<b>Team</b>	Strategy, Community Learning & Resources	<b>Directorate</b>	Learning & Skills

## 3. [When is the assessment being carried out?](#)

<b>Date of start of assessment</b>	5 <sup>th</sup> September 2023
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## 4. [Describe the proposal?](#)

What is the purpose of the proposal?
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This proposal is being considered under section 2.3 of the School Organisation Code (2018). This section refers to Regulated Alterations of a school, which includes increasing the capacity of the school by at least 25%.

The Council must ensure that schools serve their local communities and are reflective of demand. A new 1,050 place school at the current site is included as part of the Council's School Investment Programme funded by Welsh Governments Sustainable Communities for Learning programme. The proposal is to establish a new school building for St Richard Gwyn High school and increase its capacity from 813 places to 1,050 places. The proposal will also include a 60-place specialist resource base.

It is proposed that St Richard Gwyn High school would move into the new building by September 2025.

Although transferring the school to the new building is included as part of this consultation, the new school will be located on the existing school site. The new school building will be in the south-west corner of the school grounds, thus allowing the existing school to remain operational during construction. The Vale of Glamorgan Council have a duty to ensure that the current school can run effectively during the construction period and have experience of doing so on a number of other sites.

The proposed development will be funded by the Welsh Government and Vale of Glamorgan Council under the Sustainable Communities for Learning programme.

## **Why do you need to put it in place?**

St Richard Gwyn is the remaining secondary school within the Vale of Glamorgan that has not yet received investment as part of the Sustainable Communities for Learning programme.

St Richard Gwyn is situated on 5.2 hectares of land and is comprised of a main building block and several modular blocks and containers. Elements of the school were categorised as being in poor condition following a review of its condition. There is tarmac and shale finishes to the main and overflow car parks which are in poor condition and require re-surfacing. The access drive to the front of the main building and the drive to the rear playground areas are both in poor condition and also require re-surfacing. In addition to the poor building condition, the following should also be considered;

- There is a significant issue with flooding to the current site due to poor drainage in place, Vale of Glamorgan Council have worked with NRW to implement improved drainage systems to avoid risk of flooding in future.
- The new school building would be located on the same site with the improvement made to the drainage systems before construction takes place.

The redevelopment of St Richard Gwyn, increasing the number of school places from 813 to 1,050, offers a more efficient and sustainable model than a refurbishment of the current school building. The proposal also addresses issues with the existing building, such as condition, suitability, and flooding issues. Pupils would be educated in a high-quality sustainable modern building which would be able to support the delivery of a broad and balanced curriculum.

The proposal will ensure that the new building will meet modern building standards to reduce recurrent costs and be net zero carbon in operation. The new building will also meet BREEAM (Building Research Establishment Environmental Assessment Method) Excellence standards.

No changes to St Richard Gwyn's catchment area or admissions policy is proposed as part of this consultation.

**Do we need to commit significant resources to it (such as money or staff time)?**

It is estimated that the total capital funding required to build a new school be £62 million. The Council is expected to receive £52.7 million (85%) in Welsh Government match funding through the Sustainable Communities for Learning Programme for this project. A further reduction to the Councils costs may arise if Welsh Government continue to fund 100% net zero carbon costs.

Moving the school to larger accommodation with sustainable numbers would;

- Ensure the school can accommodate the future demand for faith-based education
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.
- Create a 21st Century school building that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings. The new building will meet BREEAM (Building Research Establishment Environmental Assessment Method) Excellent standards and be built to an EPC (Energy Performance Certificate) A rating.
- Develop the ethos and culture of the school and children, leading to effective interpersonal relationships and higher self-esteem.
- Provide a consistent approach from 11-16 years to promote and underpin continuity and progression for pupils, ensuring breadth and balance across the curriculum.
- To ensure progression in learning experiences as pupils transfer to the secondary school and then to post-16 education
- All curriculum planning and resourcing would build successfully on previous pupil knowledge and experience and engage interest.

<ul style="list-style-type: none"> <li>• Support pupils to develop their ability to learn new skills and apply their subject knowledge more positively and creatively across a continuum of learning.</li> <li>• Provide special recourse base (SRB) unit to facilitate additional support for pupils.</li> <li>• Continue arrangements for the care, support and guidance of pupils.</li> <li>• Promote equality of opportunity and foster good relations between those with different protected characteristics.</li> <li>• Provide more opportunities to the community, by use of facilities.</li> <li>• Promoting effective use of the Welsh language and the promotion of the Welsh dimension provide valuable opportunities for pupils to increase their cultural and historical understanding of Wales.</li> </ul>
<p><b>Who does the proposal affect?</b></p> <p>All staff, pupils, parents of pupils, governors and Diocese at St Richard Gwyn RC Comprehensive School on the date of the move to a new improved school building. The date of the move is anticipated to be September 2025.</p>
<p><b>Will the proposal affect how other organisations work?</b></p> <p>The proposal would provide an additional 237 Secondary school places and a 60 place SRB unit. This would respond to increased pupil growth in the area and support demand for secondary school places across the Vale.</p>
<p><b>Will the proposal affect how you deliver services?</b></p> <p>The Council must ensure that schools serve their local communities and are reflective of demand. There is a need to meet future demand from the new housing developments in within the Vale of Glamorgan for the faith provision, as a whole.</p> <p>All staff and pupils would move to the new school building and the governing body would remain unchanged. As part of the Vale of Glamorgan Council’s Sustainable Communities for Learning programme, over the last four years the Council have undertaken seven decants/transitions between existing and new educational facilities on existing and new sites.</p> <p>For construction works undertaken on an existing site consideration and planning was provided to assist with the teaching of leaners throughout the development programme, specific dates and events were fed into the construction programme to reduce the impact and disruption for leaners, especially around examinations times, sporting events and the like, as much as possible.</p> <p>In the case of St Richard Gwyn RC Comprehensive School one of the advantages of the proposal is the existing school will remain fully operational will minimal</p>

disruption for the operation of the existing building during the construction programme.

During the construction programme, learners and staff will be invited to attend engagement sessions to discuss their requirements for inclusion within the new facility and these engagement sessions will also include the road map to handover and opening of the new facility. Opportunities to attend the development site, when it is safe to do so, will introduce learners and staff of the new spaces they will be receiving on completion of the school development.

The road map to decant of the existing facility will commence approximately three months prior to the handover of the building, this is where staff are provided the guidance and assistance to start sorting and packing their current resource, pupils will be shown their spaces virtually until safe to do so on site, to allow all to familiarise themselves to reduce the impact of relocating and change.

### **Will the proposal impact on other policies or practices?**

The proposal is part of the Council's Sustainable Communities for Learning (SCfL) Rolling Programme. The operation of the school will continue to be supported by many policies and procedures. The governing body will be required to continue to comply with all policies, including the Council and schools Equality Policies. The school will have their part to play in meeting the equality objectives that the Learning and Skills Directorate is responsible for delivering and support the performance reported on in the annual equality monitoring report where appropriate.

### **Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?**

The proposal will include a Specialist Resource base (SRB) for additional learning spaces to help improve wellbeing of pupils and their attitudes to learning to ensure all pupils are provided with education that is appropriate to their needs.

Our formal consultation process follows Welsh Government guidelines outlined in the School Organisation Code 2018. All responses received as part of this consultation in are reflected in the Consultation Report and analysis of the protected characteristics are included in this assessment. Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known.

The Council consulted with the following groups:

Staff (teaching and non-teaching) at St Richard Gwyn Catholic High School	Diocesan Directors of Education
Parents/Carers and Guardians of children at St Richard Gwyn Catholic High School	Barry Town Council
Families First/Flying Start Management Board	Vale of Glamorgan Early Years Development Partnership (EYDCP)
Assembly Members (AM's) / Members of Parliament (MP's) / Regional Assembly Members	Local Councillors
Rhieni dros Addysg Gymraeg (RHAG)	Welsh Language Commissioner
Estyn	Neighbouring Primary and Secondary schools in the Vale of Glamorgan
Welsh Government Ministers	Central South Consortium Joint Education Service
Local Police and Crime Commissioner	Trade Unions

### How will you achieve the proposed changes?

The consultation report will be considered by the Governing Body on the 16th November 2023 and published on the school and Council's website.

Subject to Governing Body approval, the Statutory notice will be issued during which time formal written objections will be invited, this will proceed from 1st December – 29<sup>th</sup> December 2023.

### Who will deliver the proposal?

Subject to the approval of this proposal, a significant capital investment will be made to establish a new school building for St Richard Gwyn. The Council will manage the process on behalf of the Diocese, where the governing body, staff, parents and pupils of St Richard Gwyn will be fully engaged in the development of the plans, including where appropriate adaptations to the building design to ensure equality of opportunity for teaching and learning experiences. The Council will also be responsible for managing the construction.

This building would be delivered with external partners by the Sustainable Communities for Learning (SCfL) Programme within the Directorate of Learning & Skills as part of the Councils School Investment Programme following its successful bid for funding as part of the Sustainable Communities for Learning (SCfL) Programme. Projects are subject to statutory consultation and rigorous business case as required by the School Organisation Code and Welsh Government.

The Sustainable Communities for Learning (SCfL) Programme is a long-term strategic investment in educational estate throughout Wales. It is a unique collaboration between Welsh Government, the Welsh Local Government

Association (WLGA), local authorities, colleges and dioceses. All of the Vale of Glamorgan Council projects that were undertaken as part of Band A and Band B of the SCfL Programme were completed on time and on budget.

## **How will you know whether you have achieved the proposal's purpose?**

The Consultation outlines the Council's proposals to:

- Increase the capacity for Secondary Education by expanding St Richard Gwyn from 813 places to 1050 places plus 60 places for the SRB from September 2025.
- Transfer the staff and pupils from the current building to new building on the existing site

The Governing Body may decide to approve, reject or approve the proposals with modifications. In doing so, the Governing Body and Council will take into account any statutory objections that it has received.

## **5. What evidence are you using?**

### **Engagement (with internal and external stakeholders)**

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

The Council administered the responses on behalf of the Governing Body, during the consultation period, 43 individual responses were received from the 5<sup>th</sup> September – 17<sup>th</sup> October 2023. Of the total 43 individual responses received, 43 were in favour of the proposal. Estyn also formally responded to the consultation.

It has been noted that not all consultees provided a response to each of the questions and that some forms were not fully completed. In these cases, we have accepted the responses to the questions that they have chosen to answer. Where recorded the protected characteristics of the respondents are provided below.

Feedback from consultation meetings and drop-in sessions are not included in this report as it was stated clearly in the consultation document that the Council would only accept responses using the official consultation response form. Consultees were advised of this at the drop-in sessions. The Council consulted with a range of statutory consultees outlined and required by the Code.

Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The timescales for consultation comply with the

School Organisation Code and allowed 7 weeks for consultees to consider and prepare a response.

The Council is using the feedback and responses received to the engagement and consultation exercises carried out in relation to the proposal, this also included engagement with pupils of the feeder schools and St Richard Gwyn RC Comprehensive School. The Council held drop-in sessions and invited stakeholders to attend as part of the process.

Respondents were asked to complete an Equalities Monitoring form included in the consultation document.

Consultees were asked for their opinion on a key question to each proposal:

**1) Do you support the proposal to establish a new school building for St Richard Gwyn High School and increase its capacity from 813 places to 1,050 places from September 2025?**

Consultees were able to respond to each proposal with Yes, No or No opinion either way.

Consultees were invited to respond to both proposals if they so wished.

Consultees were also offered the opportunity to comment further:

**If you would like to suggest any changes or alternatives to the proposals, please detail these below.**

**Any other comments?**

A series of consultation events were held at St Richard Gwyn. These sessions included Staff meetings, Governor meetings, Parents and Community drop in events and Pupil engagement sessions. The rationale behind the proposals was highlighted at each event and an explanation of the statutory process and the timescales involved was provided with the opportunity for open dialogue between all in attendance. These sessions were open to all stakeholders in the consultation process. A report on the outcome of the pupil engagement session can be found at Annex D of the Consultation response report.

## **National data and research**

A great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.



Household projections by local authority

<https://gov.wales/docs/statistics/2017/170323-household-projections-local-authorities-2014-based-en.pdf>

Future population trends <https://www.slideshare.net/StatisticsWales/welsh-government-future-trends-report-2017-population>

ONS 2016 population estimates (row 392 code W06000014)

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland/mid2017/ukmidyearestimates2017finalversion.xls>

Protected characteristic data from 2021 Census

[Protected characteristics by disability status England and Wales: Census 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/534212/Protected_characteristics_by_disability_status_England_and_Wales_Census_2021_-_GOV.UK_(www.gov.uk).xlsx)

The Councils proposal will be delivered through the Welsh Government Sustainable Communities for Learning Programme.

## Local data and research

The Council is using current demographic, school and pupil data to inform the proposal. A strategic review of data was used to inform the process.

There has been local development of The Waterfront which is located to the south-west of Barry town centre and is positioned between the town centre and Barry Island. Approximately 1,700 dwellings will be built in total by 2024. The Barry Waterfront Development in total is projected to yield around 170 nursery, 473 primary and 422 secondary school pupils. The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. 1559 units in total have been built and occupied to date with children placed at schools serving the area. Within the Local Development (LDP) allocations there are a further 488 units planned for the Cosmeston area in Penarth and 403 units in the Sully area that serve St Richard Gwyn for parents wishing for a faith education. The 891 units are projected to yield around 89 nursery, 248 primary and 221 secondary age pupils.

There is no change to the catchment area proposed in this consultation.

## 6. [How robust is the evidence?](#)

### Does it show what the impact will be (positive and negative)?

This proposal pays due regard to the need to eliminate discrimination, advance equality, and foster good relations as an integral part of the decision-making process. The impact

of the proposal will be positive in terms of managing the demand for school places in the Vale of Glamorgan area.

The proposal will also be positive for those pupils attending St Richard Gwyn RC High School as they will have a much more suitable and modern environment, allowing them to thrive whilst learning.

The proposal has the potential to have a cause disruption on staff teaching and pupils learning whilst construction of the new build is taking place. The school will work closely with the Council to assure that measures are in place to mitigate the disruption as much as possible.

As part of the Vale of Glamorgan Council's Sustainable Communities for Learning programme, over the last four years the Council has delivered several new school buildings whilst the existing school buildings remained operational. For construction works undertaken on an existing site, consideration and planning is provided to assist with teaching throughout the development programme, specific dates and events were fed into the construction programme to reduce the impact and disruption for pupils and staff, especially around examinations times, sporting events for example, as much as possible.

### **What are the gaps?**

The protected characteristics of future new residents emanating from new developments are unknown at this stage. There is limited information held within the Directorate of the protected characteristics of the staff and governing body however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. This data may also serve to identify individuals and personal information held about them. However, as part of the consultation several opportunities via a variety of confidential methods were given to staff and governors to express concerns with relation to their personal circumstances as well as any wider concerns. No issues were raised during the consultation or subsequently that were considered to have an adverse impact on the protected characteristics of staff or governors. As a result, this is not included in this assessment. The Governing Body would ensure that they were supported to ensure that all staff would not be adversely impacted because of their protected characteristic as a result of this proposal.

### **What will you do about this?**

Consideration of the protected characteristics of the pupils, staff and governing body would be reflected in the development of the new building for example via the provision of a fully accessible building and gender-neutral toilets.

The protected characteristics of future occupiers of the school cannot be known however the new building would ensure equality of opportunity for all those accessing the new building.

Information is provided to the school by the parents and professionals on the child's enrolment at the school. This allows the school to ensure that the school can meet their needs.

### **What monitoring data will you collect?**

The Pupil Level Annual School Census (PLASC) data is collected on an annual basis, protected characteristics are captured through this process.

### **How often will you analyse and report on this?**

The pupils Level Annual School Census (PLASC) is completed annually. The Council and school use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's Governing body, the Council, the Central South Consortium and Estyn.

### **Where will you publish monitoring data and reports?**

School Census School is published by Welsh Government on the STATS Wales website for each local authority area.

There would be continued monitoring of school standards across all year groups by the Governing Body, the Local Authority and the Central South Consortium and via Estyn.

Standards in schools are monitored on an annual basis by the Consortium and reported back to the Local Authority. Standards for children who have been identified with additional learning needs, along with those children identified as school action and school action plus will also be part of the Annual National Categorisation School Report carried out by the Central South Consortium in partnership with the school.

## **7. Impact**

### **Is there an impact?**

There would be a positive impact on persons with the protected characteristics of age, disability and gender reassignment/ identity. The proposal would support the school to ensure that it has the improved facilities to promote equality of opportunity and foster good relations between those with different protected characteristics. There has been no perceived negative impact on the protected characteristics identified.

It is acknowledged that the current building design impacts on some pupils with disabilities who always need an adult with them to open doors which impacts their independence.

The existing site is not fully compliant with the requirements of the Equality Act 2010 due to site constraints.

It is also acknowledged that there is a lack of space in the current school which impacts on pupils who require emotional support. Users recognise that unisex toilets with accessible and changing facilities would also be a priority in the new setting.

The school will need to work with colleagues in the Council to establish how best to use this space given the needs of the school and to develop a suitable model for wheelchair users and pupils who require emotional support. Successful implementation of the proposal would enable compliance by providing a fully accessible building, providing a suitable setting with gender neutral facilities.

The positive impacts are outlined below in the relevant section.

## **If there is no impact, what is the justification for thinking this? Provide evidence.**

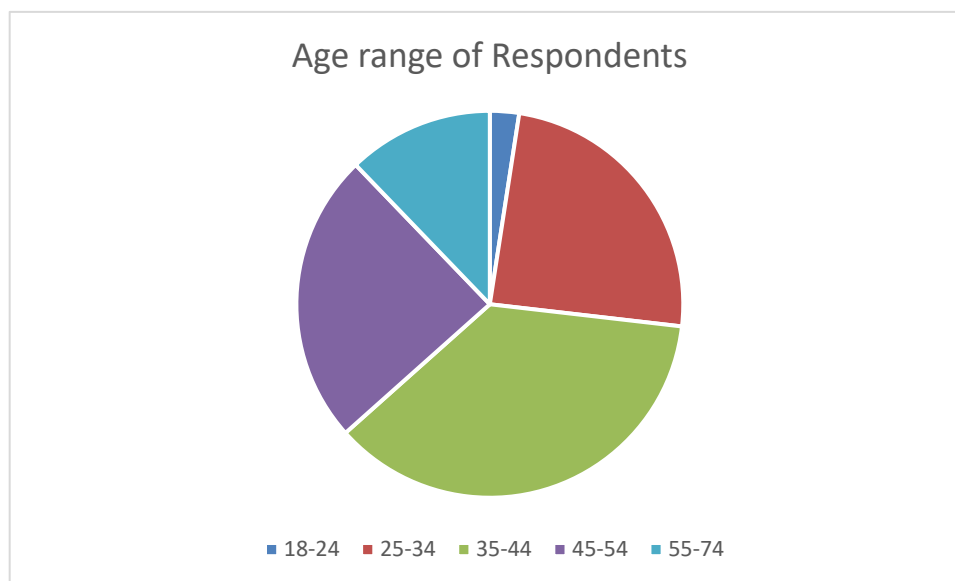
Evidence is assessed through the consultation process and through school and pupil data.

## **If there is likely to be an impact, what is it?**

### **Age**

According to the Pupil Level Annual School Census (PLASC) carried out in January 2023 there were 833 pupils on roll aged between 11-16.

43 people responded to the consultation, 43 were completed via the online form. Age related data is only available for submissions received online, for those who chose to provide the detail. 41 respondents provided this information, 2 chose not to include this information.



This proposal would develop continuity and progression in pupils learning from the age of 11 – 16 years. The school would be able to provide sufficient places for Secondary School age pupils that would not be available without the new school building.

As the school would be of sufficient size to provide the required places for pupils of secondary school age within the area. The proposal would provide a **positive** impact for children of these age brackets. However, it is noted that section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).

### Disability

The data held on pupils is characterised by Special Educational Needs (SEN). 15.25% of pupils attending St Richard Gwyn RC High School have SEN. This will include pupils with a disability however it will also include pupils without a disability. The degree of need varies across a range of additional learning need types including:

Additional Learning Needs (ALN) Groups
ASD (Autistic Spectrum Disorder)
BESD (Behavioural, emotional and social difficulties)
DYSL (Dyslexia)
GLD (General Learning Difficulties)
MLD (Moderate Learning Difficulties)
SLCD (Speech, Language and Communication Difficulties)

The table below provides a breakdown of pupils identified in St Richard Gwyn RC High School that require additional support.

Support	Number of pupils	Percentage
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School Action	90	10.80%
School Action Plus	11	1.32%
Statement of SEN	0	0.00%
School Maintained IDP	24	2.88%
L.A Maintained IDP	2	0.24%
NONE (No SEN)	706	84.75%
<b>Total Number of Pupils</b>	<b>833</b>	

No respondents to the consultation said their day-to-day activities were limited because of a physical or mental condition. No respondents indicated that this proposal would have an adverse impact on their disability.

The proposed new school building would be designed in such a way as to equip staff to meet the needs of learners with additional learning needs.

The school would provide a targeted and bespoke curriculum which is responsive to the individual pupil's abilities and ensures that all pupils who require additional support are integrated across all areas of the curriculum.

As the staff would remain unchanged, they would be very aware of the individual needs of pupils. All staff, governors and pupils would be able to liaise with the Council at the design stage to ensure that the learning environment is supportive of all pupils, including those who benefit from a quieter learning environment.

There are many design elements that could be incorporated to support pupils. These could include, for example a small room between a pair of classrooms which could be used for individual / small group learning or could be used as a breakout space should a pupil need to retreat from the classroom. Creative use of acoustic materials and bespoke calming colour schemes etc. would also be considered by part of the design team in full consultation with staff pupils and governors. The school will be designed to have flexible spaces which could be adapted using furniture for specific activities, which would include quiet areas for individual learning. The building will be designed to current acoustic standards (BB93). This will define the acoustic performance standard that the school will be designed to. The whole building will be designed to comply with current building regulations for disabled access, with parking and access into the school building as well as assess throughout the school. Natural daylighting and ventilation will be a key feature of the new learning environment.

This data is collected where appropriate on admission and the Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's Governing Body, the Council, the Central South Consortium and Estyn.

Based on the policies in place that would not change as a result of the move to a new school building, staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school and all people accessing the building will benefit from its accessible nature.

The proposal will therefore provide a **positive** impact for pupils, staff, governors and the wider community visiting the school who have been identified within this protected group as they will have access to a fully accessible school building which has been designed to

## **Gender reassignment, including gender identity**

Gender reassignment is not consistently recorded for secondary age pupils however individual pupils choosing to live other than at their birth gender are supported within Primary Schools. All pupils would continue to receive a high-quality education at the new school. The new building would have suitable facilities in place to accommodate pupils of any gender; no pupil would need to consider changing schools due to gender reassignment.

Pupils and staff have the right to access the toilet that corresponds to their gender identity. Any pupil or staff member who has a need or desire for increased privacy, regardless of the underlying reason, would be provided access to a single stall toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide single stall toilets that can be used by all, albeit separate facilities would be available for adults and children.

The use of changing rooms by Trans pupils and staff would be assessed on a case by-case basis in discussion with the individual concerned. The school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing adverse impact for the individual. In most cases, Trans pupils or staff would have access to a changing space that corresponds to their gender identity.

The transfer of St Richard Gwyn to a new school would therefore have a positive impact on individuals protected under the duty of gender reassignment. All pupils would continue to receive a high-quality education as part of an 11-to-16-year school. Staff would continue to receive protection under the Equalities Act 2010.

Staff would also have access to improved, gender-neutral facilities and would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school. Non-binary people, including staff, governors and members of the community accessing the facilities would benefit from the gender-neutral adaptations to the school that have been identified above.

None of the respondents indicated that this proposal would have an adverse impact on their gender identity. However, it has been acknowledged that one respondent was concerned about girls having suitable toilets for privacy. Based on current evidence this proposal would have a **positive** impact on this protected group.

## **Marriage and civil partnership (discrimination only)**

The Equality monitoring form indicates the following breakdown. Of the 43 responses, 40 responders choose to answer this question.

What is your marital status?	
Married and living with husband/wife	22 (55%)
Civil Partnership	13 (32.5%)
Preferred not to say	3 (7.5%)
Divorced	2 (3.30%)

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. This information is not held at a directorate level for staff and governors however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. The majority of pupils at the School are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.

Based on the policies in place that would not change because of the transfer to a new school building, this proposal would have a **neutral** impact on this protected group.

### **Pregnancy and Maternity**

It is considered that there will not be a negative impact on pupils in this protected group. The provision of education for any pupil who were within this protected group would remain unaltered by the proposal.

Staff who are currently on maternity leave or are pregnant at the point of the proposed move would be protected under the Equalities Act 2010.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change because of the proposal, this proposal would have a **neutral** impact on people in this protected group.

### **Race**

The predominant ethnicity at St Richard Gwyn RC High School is currently White – Welsh/English/Scottish/Northern Irish British with 75.63% of children falling within this category. This is significantly lower than the average (89.97% White British) across the wider Vale Secondary School population. The remaining 25% of children fall within other ethnicity groups including White/ Asian/ Black Caribbean/ Indian.

As the pupils will be moving to a new school building, it is unlikely that the proposal will change the ethnic profile of the school.

All staff, pupils and governors would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change because



of the proposal and the very small number of pupils in this category, this proposal would have a **neutral** impact on people in this protected group.

## Religion and belief

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

Respect for all religious and non-religious beliefs would not change due to this proposal. The aspect of the curriculum relating to religion and belief would not change as a result of this proposal.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal this proposal would have a **positive** impact on people in this protected group as the new school will accommodate additional places within a faith school.

## Sex

The school currently has 49.9 % female pupils on roll and 50.1% male pupils. This is the same percentage as the Vale wide secondary pupil population therefore there would be no perceived negative impact. (49.5% female and 50.5% male)

The staff population is 73.6% female and 26.4% male, compared with a Vale wide profile of 68.6% female, 31.4% male staff in Secondary Schools.

Children of both sexes would be treated and taught equally in the school at its new site. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce - as far as possible - segregating pupils and students by Gender. Pupils would continue to be supported to enable equal access to PE and where lessons are segregated by sex/gender they would be enabled to participate in the activity which corresponds to their gender identity if this is what they request. The aspect of the curriculum management relating to any identified gender-based attainment gap would not change as a result of this proposal.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

From those respondents who fully or partially completed the Equal Opportunities Monitoring form

83% (34) were completed by women

17% (7) were completed by men

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change because of the proposal, this proposal would have a **neutral** impact on people in this protected group.

## Sexual orientation

Inclusivity and respect of others is an intrinsic element of the national curriculum. The principles of school inspection as described in the 'Framework for School Inspection',

The Estyn School Inspection Handbook also details how inspection will evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social and cultural development Estyn will look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.

Inspectors will also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

The Equality monitoring form for respondents indicates the following breakdown.

**Which of the following options best describes how you think of yourself?**

Heterosexual / straight	87.8%	36
Gay or lesbian	0	0
Bisexual	2.44%	1
Prefer not to say	9.76%	4
Other		
Total responses	100%	41

Based on the policies in place that would not change because of the proposal, this proposal would have a **neutral** impact on people in this protected group.

**Welsh language**

The Council's School Investment Programme reflects the Council's commitments in the Welsh in Education Strategic Plan (WESP), which aims to ensure that demand for Welsh medium education can be met in the long-term. In line with Welsh Government's National Cymraeg 2050 strategy and contributing to its ambitious target of 1 million Welsh speakers by 2050.

St Richard Gwyn is not a Welsh medium secondary school but offers a range of extra-curricular activities that give pupils access to worthwhile sporting, educational and cultural

opportunities. The school promote positive impact on standards achieved and attitudes towards the Welsh language.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group as it would be providing a more modern building with opportunities to enhance Welsh medium education.

## Human rights

Consideration of the UNICEF document, A Human Rights-Based Approach to Education For All was given as part of the development of this consultation. This document advises that Chapter 2 introduces a conceptual framework for the rights-based approach to education that embodies three interlinked and interdependent dimensions. It contends that human rights related to education cannot be realized unless and until all three are addressed:

- The right of access to education – the right of every child to education on the basis of equality of opportunity and without discrimination on any grounds. To achieve this goal, education must be available for, accessible to and inclusive of all children.
- The right to quality education – the right of every child to a quality education that enables him or her to fulfil his or her potential, realize opportunities for employment and develop life skills. To achieve this goal, education needs to be child-centred, relevant and embrace a broad curriculum, and be appropriately resourced and monitored.
- The right to respect within the learning environment – the right of every child to respect for her or his inherent dignity and to have her or his universal human rights respected within the education system. To achieve this goal, education must be provided in a way that is consistent with human rights, including equal respect for every child, opportunities for meaningful participation, freedom from all forms of violence, and respect for language, culture and religion.

This proposal has been presented in order to address the right of access to education, the right to quality education and the right to respect within the learning environment for all pupils within the Vale of Glamorgan.

It is not anticipated that there would be any adverse impacts for staff as they would simply move to a new building on their existing contracts. This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels. If the proposal come to fruition, the governing body and headteacher would need to consider an increase in the staffing structure for the additional pupil numbers from September 2025. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trades unions where necessary.

The Vale of Glamorgan Council fully supports the governors, headteacher and staff at the school with any employment related matters. The school has access to the Council's Human Resources policies and procedures, including recruitment policies. The Human Resources service works closely with governors to ensure regular and clear communication with all employees takes place on all matters.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **positive** impact on people in this protected group

## How do you know?

**Explain this for each of the relevant protected characteristics as identified above.**

Data is provided and analysed through the Pupil Level Annual School Census data collected in the January of each year. The Council also uses current demographic, school and pupil data to inform the proposal. The staff would also continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

## What can be done to promote a positive impact?

**Explain this for each of the relevant protected characteristics as identified above.**

The availability of the school, its benefits and the facilities available will be published on the School and Council's website and through the Council's Parental Guide to School Admissions for parents to consider when deciding on where to apply to for a pupil place. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard would therefore be paid to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities would be key to the design of the new building. Having due regard to 'fostering good relations' involves having due regard to the need to tackle prejudice and promote understanding. This is an important aspect to curriculum delivery and would not change because of this proposal

It is acknowledged that complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

**Age**

As the school would continue to provide sufficient places for children of comprehensive school age, the proposal would provide a **positive** impact for children. Inclusivity and respect of others is an intrinsic element of the national curriculum.

## **Disability**

St Richard Gwyn site is currently constrained and too small to expand the existing building to meet Building Bulletin requirements as adopted by the Welsh Government for the SCfL Programme. The site is not fully accessible due to a confined site and the buildings do not meet SCfL design guidance. This new building would be designed to ensure it was fully accessible to all, regardless of the nature of their disability. The proposal would therefore have a **positive** impact for people with this characteristic.

## **Gender reassignment, including gender identity**

All children would be supported to receive a high-quality education if the proposal were to be successfully implemented regardless of gender identity. The school will have suitable facilities in place to accommodate pupils of any gender; no pupil or staff member would need to consider changing schools due to gender reassignment.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The proposal would therefore provide a **positive** impact.

## **Marriage and civil partnership**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Diocese, Governing Body and Council to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **neutral** impact.

## **Pregnancy and Maternity**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **neutral** impact.

## **Race**

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **neutral** impact.

## Religion and belief

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **positive** impact on this group as the new school building would provide additional places in faith school.

## Sex

Pupils of both sexes would continue to be treated and taught equally in the new school building. There would be no different methods of teaching or curricula for either sex. Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **neutral** impact.

## Sexual orientation

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources. The proposal would provide a **neutral** impact.

## Welsh language

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group as it would be providing a more modern building with opportunities to enhance Welsh medium education.

## Human rights

This proposal would provide a **positive impact**, it been presented in order to address the right of access to education, the right to quality education and the right to respect within the learning environment for all pupils within the Vale of Glamorgan.

## What can be done to lessen the risk of a negative impact?

**Explain this for each of the relevant protected characteristics as identified above.**

The protected characteristics of any future pupils are not currently known. At present there is no evidence to suggest reasonable adjustment would be required for any pupil, however parents will be encouraged to discuss any needs with both the school and the Council, should the proposal be implemented, during the transition phase.

Any pupil attending St Richard Gwyn on the date of the move to the new school who lives more than 3 miles from the new school would be entitled to free school transport.

All pupils who live under 3 miles from the school, but who do not have a safe walking route to the school (including those from the Dinas Powys area), will be entitled to free school transport.

The exact arrangements around school transport would be determined by the school transport department.

## Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

The current facilities are not fully accessible, and this would be addressed positively as part of this proposal. The building will be designed to be fully accessible. In addition, small classrooms and quiet break out areas will be considered as part of the design plan to ensure that children requiring a quieter and less busy learning environment can be accommodated.

## Will the impact be positive, negative or neutral?

**Explain this for each of the relevant protected characteristics as identified above.**

**Age – Positive**

**Disability – Positive**

**Gender reassignment, including gender identity – Positive**

**Marriage and civil partnership – Neutral**

**Pregnancy and Maternity – Neutral**

**Race – Neutral**

**Religion and belief – positive**

**Sex – Neutral**

**Sexual orientation – Neutral**

**Welsh language – Neutral**  
**Human rights – Positive**

In conclusion, there is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely, improving the capacity and efficiency of education) and the decision to publish the proposals to make regulated alterations is a proportionate means of achieving that aim.

## 8. Monitoring on-going impact

### **Date you will monitor progress**

PLASC data is annual and if approved by the Governing Body, a project plan for this proposal will be initiated. This will include reference to this document. Any changes in outcomes resulting from this ongoing analysis will be used to update this Equality Impact Assessment, including any mitigating actions which may be required.

### **Measures that you will monitor**

PLASC data for all pupils will be broken down and monitored by Age, Disability, Race, Religion and belief and Welsh language. The Equalities Team monitors service data and provides information in the annual equality monitoring report. The measures identified for the education of pupils are a matter for the governing body in their School Improvement Plan.

### **Date you will review implemented proposal and its impact**

The governing body will work closely with the Council to ensure that standards are robust, that teaching and learning is of a high quality and that leadership and governance is strong. The Council works with two organisations to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty's Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under section 104 of the Government Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority works with the Consortium to support and challenge all schools in the Vale of Glamorgan.

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they



may improve the quality of education offered and raise the standards achieved by their pupils (Estyn).

In September 2017 a new Estyn School Common Inspection Framework was introduced for all schools across Wales. St Richard Gwyn was last inspected in May 2017.

Under the new framework, inspectors will provide an overview of the school's current performance and recommendations for improvement.

## 9. Further action as a result of this equality impact assessment

Possible Outcomes	Say which applies
No major change	yes
Adjust the policy	
Continue the policy	
Stop and remove the policy	

## 10. Outcomes and Actions

Recommend actions to senior management team
Outcome following formal consideration of proposal by senior management team

## 11. Important Note

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.

## 12. Publication

Where will you publish your approved proposal and equality impact assessment?  
Vale of Glamorgan Website

In addition to anywhere you intend to publish your approved proposal and equality impact assessment, you must send a copy to Tim Greaves, Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website.

### 13. [Authorisation](#)

<b>Approved by (name)</b>	Lisa Lewis
<b>Job Title (senior manager)</b>	Operational Manager, Strategy & Resources
<b>Date of approval</b>	November 2023
<b>Date of review</b>	To be reviewed following the statutory objection period, should the proposal progress

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