

Equality Impact Assessment [version 2.9]



Title: Dedicated Schools Grant Budget 2023-24	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] Budget	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: People	Lead Officer name: Richard Hanks
Service Area: Education and Skills	Lead Officer role: Interim Director

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use [plain English](#), avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Purpose:

To note the in year 2022/23 position for the overall Dedicated Schools Grant and to set the Dedicated Schools Grant for 2023/2024 to create a fair and consistent distribution of funding that is closely aligned to need and is essential to supporting opportunity for all children, irrespective of their background, ability and need.

The Dedicated Schools Grant is the main source of revenue funding for state-funded 5 to 16 schools in England. DSG is paid to local authorities, minus deductions ('recoupment') for academies and subject to certain other adjustments. The Grant comprises of four blocks:

- The Schools Block
- Schools Central Services Block
- The High Needs Block
- The Early Years Block

The Dedicated Schools Grant (DSG) is a ring-fenced grant of which the majority is used to fund individual school budgets in maintained schools, academies and free schools. It also funds early years nursery free entitlement places for two, three and four year olds as well as provision for pupils with high needs including those with Special Educational Needs and or Disabilities (SEND) Education Health and Care Plans (EHCPs) in special schools and specialist provision in and out of Bristol.

Our Goals:

- Enable all children and young people to achieve their potential through having access to the right resources and provision needed to meet their needs and the right support for their education settings.
- Improve outcomes for Bristol's children and young people with SEND as well as those identified with high needs including educational aspirations, engagement and progress in learning, in line with those who do not have SEND or high needs.
- Make sure all children and young people attend the right education setting that can meet their needs, where they receive a full time/ appropriate education offer that ensures they are safeguarded and their

welfare is promoted.

- Reduce persistent absence and increase attendance for children and young people in receipt of SEN Support and those with EHCPs.
- Reduce / eliminate the need for permanent exclusions and reduce multiple suspensions for children and young people in receipt of SEN Support and those with EHCPs.
- Ensure each young person progresses post-16 to suitable education, training or employment and is fully prepared for adulthood.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Joint Strategic Needs Assessment	The Joint Strategic Needs Assessment reports on the

Joint Strategic Needs Assessment (JSNA) (bristol.gov.uk)	<p>health and wellbeing needs of the people of Bristol. It brings together detailed information on local health and wellbeing needs and looks ahead at emerging challenges and projected future needs. The JSNA is used to provide a comprehensive picture of the health and wellbeing needs of Bristol (now and in the future); inform decisions about how we design, commission and deliver services, and also about how the urban environment is planned and managed; improve and protect health and wellbeing outcomes across the city while reducing health inequalities; and provide partner organisations with information on the changing health and wellbeing needs of Bristol, at a local level, to support better service delivery.</p>
<p>SEN2 Education, health and care plans, Reporting Year 2022 – Explore education statistics – GOV.UK (explore-education-statistics.service.gov.uk)</p>	<p>This is an annual statutory return which provides data on children and young people with an education, health and care (EHC) plan maintained by the local authority.</p>
<p>Local Area education performance (Early Years, School Age mainstream and specialist provision) Early years foundation stage profile results: 2018 to 2019 - GOV.UK (www.gov.uk) Key stage 2 attainment 2022: national headlines - GOV.UK (www.gov.uk) Key stage 4 performance 2022 - GOV.UK (www.gov.uk)</p>	<p>National statistics published by the DfE on attainment outcomes for local authorities for early years foundation stage and at the end of Key stage 2 and Key stage 4. Includes a breakdown by characteristics including SEN provision.</p>
<p>Attendance and absence data Statistics: pupil absence - GOV.UK (www.gov.uk)</p>	<p>DfE Statistics on overall authorised and unauthorised pupil absences by school type, including persistent absentees and pupil characteristics</p>
<p>Population of Bristol https://www.bristol.gov.uk/statistics-census-information/the-population-of-bristol</p>	<p>Updated annually. The report brings together statistics on the current estimated population of Bristol, recent trends in population, future projections and looks at the key characteristics of the people living in Bristol.</p>
<p>Additional comments: Summary points</p> <p>Numbers of children and young people with SEN in Bristol schools</p> <p>As at October 2022, there were 63,344 children on roll in Bristol schools.</p> <ul style="list-style-type: none"> • 11,892 (18.7%) pupils with special educational needs (SEN) • 9,284 (14.6%) are receiving SEN support • 2,608 (4.1%) have an Education, Health and Care Plan (EHCP) <p>5,025 pupils with SEN support are at a primary school (14.1% of all primary pupils) and 3,488 are at secondary schools (incl. All-throughs) in Bristol (15.4% of secondary pupils).</p> <ul style="list-style-type: none"> • 1,280 pupils with an EHCP are attending a special school (99% of all pupils in special schools), 643 are at secondary school, (incl. All-throughs) which is 2.8% of all pupils in secondary school and 648 are at primary schools (1.8% of all pupils at primary). 6 pupils with an EHCP are attending nursery and 32 a pupil referral unit. • The most prevalent primary needs by SEN in Bristol are: Social, Emotional and Mental Health; Speech, Language and Communication Needs; Specific Learning Difficulty; Moderate Learning Difficulty; Autistic Spectrum Disorder. 	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Disability | <input type="checkbox"/> Gender Reassignment |
| <input type="checkbox"/> Marriage and Civil Partnership | <input type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race |
| <input type="checkbox"/> Religion or Belief | <input checked="" type="checkbox"/> Sex | <input type="checkbox"/> Sexual Orientation |

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There are gaps in performance and attendance data due to the impact of Covid on school continuity and exams. Bristol City Council commissioned a SEND data independent review¹ in 2019 with a number of recommendations to improve data collection which have/are being implemented.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We consulted all schools in October 2022 on the proposals to transfer funding between blocks, on the principles of the funding formula for mainstream schools and the arrangements for some central budgets for maintained mainstream schools.

We have completed consultation with all Early Years settings in relation to the funding in this area. It is proposed to pass on all increases in the base rate to providers for 2 year olds (£0.06 per hour) and 3 and 4 year olds (£0.09 per hour).

Where it is in the local authority remit we will explore opportunities to target funding to those groups which the evidence demonstrates face barriers to their educational achievement. However, the move to a national funding formula is reducing the scope we have locally to influence the funding formula. We believe that all pupils will benefit from a fairer distribution of funding. Where decisions may have a disproportionate impact on some children and young people because of the protected characteristics, appropriate engagement and consultation will ensure the views of service users, and groups that represent them are taken into account and help build a consensus around the case if any for change and that our statutory duties are complied with.

All responses to the DSG Budget Consultation have been analysed and summarised in relevant Schools Forum reports that are published on the Bristol City Council website.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include

any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Schools Forum will continue to engage in the budget developments through the main meetings and finance sub-group.

Two Schools Forum Steering Groups have been established to support the development and implementation of the DSG Management Plan. The Groups are focused on the Early Years Block and the High Needs Block.

We have completed an engagement process regarding the proposed mitigations, as part of the developing DSG Management Plan and the implementation of the Delivering Better Value programme.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Through the Local Authority's statutory role and duties, consideration is given to any adverse impact on children and young people, based on their protected characteristics. These duties include:

- Determination of the budgets for distribution to schools and early years settings, and allocation of the High Needs Block – all in the context of the National Funding Formula for each block.
- Commissioning of school places, personal education packages, alternative learning provision and post 16 education for children and young people we are responsible for.
- Responsibility for ensuring there are sufficient education places and the right types of education settings in our area.
- Arranging education for permanently excluded pupils, children and young people with EHCPs and Children in Care and others who, because of illness or other reasons, are unable to attend mainstream settings.
- Ensuring the Local Authority, schools and other partners are focused on safeguarding and promoting the welfare of children and young people with SEND up to age 25.
- Promoting and driving high standards in education across all types of educational provision.
- Establishing financial provision for children and young people with EHCPs
- Ensuring compliance with statutory duties associated with SEND legislation, safeguarding and Looked After Children/ Care Leavers.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Whilst rates for 2 year olds and 3 & 4 years olds will be somewhat increased, this will not compensate for the inflationary pressures providers are experiencing. It is likely that more providers will find operating sustainably to be challenging and recruitment and retention of staff weakening. This will potentially lead to a reduction in sufficiency of places and reduce the quality of education.
Mitigations:	Work is ongoing to ensure that Maintained Nursery Schools operate on a financially

	sustainable model. The increase in funding will support these measures and secure high-quality education in the most deprived areas of the city. A recruitment and retention task group is looking at a range of options to promote working in the early years sector.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The High Needs budget is being set on the basis of existing policies and existing rates to settings, with forecast levels of demand. The budget proposals, as they stand, represent no change on existing practice or funding rates, but the programme will seek to understand and address areas where outcomes for Disabled children and young people are not good.
Mitigations:	Any changes to policies or rates will emerge from the work of the DSG Mitigation Plan and the Delivering Better Value Programme and will take account of impacts through stakeholder engagement, consultation and equality impact assessments.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • The population of Bristol has become increasingly diverse, and some local communities have changed significantly. There are now at least 45 religions, at least 180 countries of birth and at least 91 main languages spoken. The proportion of the overall Black, Asian and minoritised ethnic population has increased from 16% (2011) to 18.9% (2021) • Whilst we do not think that the overall budget setting should have a disproportionate impact on Race we are aware of existing disparities for Black, Asian and minority ethnic pupils. The 2017 Runnymede Report “Bristol - a city divided?” found ethnic minorities in Bristol experience greater disadvantage than in England and Wales as a whole in education and this is particularly so for Black African people. Black African young people are persistently disadvantaged in education compared to their White peers and addressing educational inequalities requires attention to the unrepresentativeness of the curriculum, lack of diversity in teaching staff and school leadership and poor engagement with parents. • Although Bristol has low rates of permanent exclusion it has one of the highest rates for fixed term exclusions of any local authority in England, and a disproportionately high percentage of school pupils from Black, Asian and minority ethnic backgrounds have had one or more fixed term exclusion, compared to other English core cities and nationally. Nationally Gypsy and Roma, and Traveller of Irish Heritage pupils have the highest school exclusion rates (both permanent and temporary) however Mixed White and Black Caribbean, and Black Caribbean pupils also have high exclusion rates, and both are nearly three times as likely to be permanently excluded as White British pupils. • There is an urgent need to recruit more Black Asian and ethnic minority teachers and teaching staff in Bristol. A 2018 BBC report⁴ found that of the 1,300 teachers in Bristol, only 26 were Black, equating to less than two per cent. Local stakeholder engagement suggests schools may indirectly discriminate against Black, Asian and

	<p>minority ethnic pupils due to lack of cultural competence. Rules about appearance may penalise pupils who dress differently or have different hairstyles. Conduct rules may not take into account the diversity of culture around language and ways of demonstrating inter-generational respect.</p> <ul style="list-style-type: none"> • Other research indicates Black and Mixed ethnicity pupils in England (especially boys) are frequently associated by school staff with criminality, violence and hyper-sexuality e.g. groups of friends and siblings labelled as a 'gang'5. Youth workers and education professionals in Bristol have told us that Black pupils may struggle to understand their own cultural identity. Just as there is a disproportionately high 'stop and search' rate of ethnic minority young people by police, Black, Asian and minority ethnic school children may face additional discrimination because of their visibility.
Mitigations:	There is limited scope to address systemic inequality in this budget setting however all known existing disparities should be acknowledged and considered as part of ongoing service design and commissioning.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • 27.9% of pupils are classed as disadvantaged in Bristol • 26.3% pupils receive Free School Meals • Overall 70.7% of Early Years learners achieve a good level of development in Bristol. However there are big disparities by area with e.g. 53.9% in Hartcliffe and Withywood, and 91.3% in Cotham • Hartcliffe and Withywood has the highest rate of school pupils with SEN in Bristol (234.5 per 1,000) and Cotham has the lowest (95.6 per 1,000)
Mitigations:	In setting this Budget we are acutely aware of existing disparities for pupils living in areas of deprivation and low income households. Whilst there is limited scope to address systemic issues in this budget setting we have considered socio-economic inequality as far as possible and will continue to do so as part of ongoing service design and commissioning. There is a deprivation measure (based on IDACI) applied to the supplements provided to Early Years settings.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As above any negative impact on Early Years settings may restrict the range of provision available which would have a disproportionate impact on carers
Mitigations:	As above
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't

- ✓ Foster good relations between people who share a protected characteristic and those who don't

The Maintained Nursery School supplementary funding has increased for 2023/24 by £1.5M. This is as a result of the implementation of a base funding floor of £3.80 per universal hour (previously £0.98 per hour). This increase will support Maintained Nursery Schools working with some of the most vulnerable young people in areas of high deprivation across the city.

The transfer of £1.6m from Schools Block to High Needs Block has been agreed in principle, after consultation with all schools and a formal decision by Schools Forum. This provides more funding to support transformation of Education Services to improve the quality and sustainability of funding to support pupils with protected characteristics in the High Needs Block. Decision to be formalised in January's Schools Forum meeting.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

No significant negative impact identified from the overall budget setting. Although increases in base rates and overall block unlikely to meet the increasing demand and inflationary costs experienced by schools and settings.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The EQiA has helped shaped the whole approach to setting the DSG for 2023/24, particularly for the High Needs budget.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
We have thoroughly reconsidered the equalities impacts and consultation duties associated with service planning and budget setting.	Angel Lai	Completed
We will update this equality impact assessment with any potential impacts identified through analysis of local and national data set, and emerging issues.	Richard Hanks	Ongoing
Additional EQiA, specifically related to the new DSG Management Plan and Delivering Better Value implementation plan is currently in development and will be provided, alongside the plan, to Schools Forum in March 2023.	Richard Hanks	Ongoing

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Ongoing review through the statutory function of Schools Forum, which meets bi-monthly. This is a key stakeholder forum for the Local Authority.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Richard Hanks
Date: 12/1/2023	Date: 03.01.2023

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.