

Equality Impact Assessment

In order to comply with the Public Sector Equality Duty, the Council needs to ensure that its policies, strategies, services and functions demonstrate consideration of the need to:

- eliminate unlawful discrimination, harassment and victimisation,
- advance equality of opportunity between those who share a protected characteristic and those who don't, and
- foster good relations between people who share a protected characteristic and those who don't.

Equality Impact Assessments (EIAs) help us identify the impact of our decisions on different groups of people, particularly those with a protected characteristic. It will also help identify if any particular group will be impacted more or in a different way than other groups.

A positive impact can be identified when the proposal is beneficial or delivers improvements for some or all of the protected characteristics.

A negative impact is identified when the proposal is likely to be detrimental to one or more of the protected characteristics.

No impact can be identified when the proposal will not affect one or more of the protected characteristics.

Where a negative impact is identified, consideration of how to mitigate the impact must be included in the EIA.

The protected characteristics are:

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| • Age | • Race |
| • Disability | • Religion or belief (including lack of religion or belief) |
| • Gender Reassignment | • Sex |
| • Marriage and Civil Partnership | • Sexual orientation |
| • Pregnancy and Maternity | |

Assessing the Impact on Groups who Share a Protected Characteristic

Protected Characteristics	Tick one impact for each group			Provide details of the evidence and data source used to determine the impact or lack of impact.	For positive or negative impacts, provide details of the likely impact.	For negative impacts, provide details of the consideration of mitigating action(s).
	Positive Impact	Negative Impact	No Impact			
AGE	X	X		<p>All councils in Wales must provide enough school places for pupils of all ages. School places must meet the needs of all pupils and must be suitable for any additional learning needs.</p> <p>Cardiff Council is committed to the principles of inclusion.</p> <p>The majority of learners with Additional Learning Needs (ALN) attend a local mainstream school, and benefit from effective Additional Learning Provision (ALP).</p> <p>These learners do not need to attend a special school or specialist resource base.</p> <p>However, it is recognised that in order to thrive and fulfil their potential, children and young people with the most complex additional learning needs require access to the specialist</p>	<p>The proposals would have a positive impact on school age learners with additional learning needs with an overall increase in the number of high-quality Additional Learning Needs places.</p> <p>The aim of the proposed changes is to improve the match between the supply of and demand of places for specialist provision for learners with emotional health and wellbeing needs and complex learning needs.</p> <p>The options identified would provide a phased increase in the number of specialist places and would:</p> <ul style="list-style-type: none"> • Support children of school age who have 	<p>Any changes would require carefully planned support to enable learners to adapt to the new setting. There would be sufficient time and well-established processes to plan and support such a transition.</p> <p>The Council would work with the relevant Governing Bodies to develop a Travel Plan to minimise any potential disruption.</p> <p>The proposals would require the Governing Body to consider the workforce requirements in readiness for the transfer and expansion. The Governing Body would be encouraged to undertake this work in line with the School Organisation Planning</p>

				<p>environments and expertise of a special school or specialist resource base.</p> <p>The number of pupils with severe and complex needs, who need a place in a special school or specialist resource base has continued to grow.</p> <p>This is because of:</p> <ul style="list-style-type: none"> • Improved survival rates for children born with significant disabilities, resulting in a higher number of pupils with severe and complex disabilities. • Increased complexity in needs, which has meant that the demand for specialist provision has continued to grow. The range of expertise, specialist support and facilities required in special schools and specialist resource bases has also increased. • Increased incidence and identification of specific needs such as autism, ADHD, physical disabilities and sensory impairments. 	<p>additional learning needs.</p> <ul style="list-style-type: none"> • Support a holistic, vocational and therapeutic curriculum including life skills. • Provide a mix of revolving door assessment places at KS3 and long-term placements. • Reduce reliance on independent school places, and possible out of county placements. • Ensure capacity to support looked after children in Cardiff schools, in line with the 'Closer to Home' strategy. • Establish gender-inclusive approaches to all specialist provision in Cardiff. • Increase the opportunities for primary aged learners to access specialist provision on a 	<p>HR Framework. HR People Services would provide advice, support and guidance to the Governing Body for the workforce planning process and consequential recruitment processes.</p>
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			<ul style="list-style-type: none"> • More children and young people with emotional health and wellbeing needs. This was a trend before COVID 19 but has been exacerbated by school closures and other measures to manage the pandemic. <p>The proposed changes respond to increasing demand for additional learning needs places</p> <p>EHW primary - there is an estimated provision gap of 36 special school places and 52 SRB places in 2026/27, rising to 45 special school places and 61 SRB places in 2031/32.</p> <p>EHW secondary - there is an estimated provision gap of 66 special school / PRU places and 33 SRB places in 2026/27, growing to a gap of 128 special school / PRU places and 39 SRB places in 2031/32 if no changes are made. However, when accounting only for permanent capacity in special schools, as the PRU does not provide permanent placements, there is an estimated provision gap of 260 special school places in 2026/27, rising to 288 special school places in 2031/32.</p>	<p>mainstream school site.</p> <ul style="list-style-type: none"> • Further develop support for pupils to maintain links with and return to mainstream education where possible. • Create strong links between mainstream and special schools to support dual placements and a richer learning experience. • Improve the range of post-16 opportunities, including supported pathways to employment. <p>A change in environment can be unsettling for children which may impact on their learning and wellbeing.</p> <p>The numbers of learners who continue to use Learner Transport for their journey to school will be likely to increase in line with the trend for increasing numbers of</p>	
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				<p>CLN/PMLD primary - there is an estimated provision gap of 204 special school places and 7 SRB places in 2026/27, taking account of temporary measures in place. This gap is projected to increase to 308 special school places and 23 SRB places in 2031/32, if no changes are made and temporary measures are not extended.</p> <p>CLN/PMLD secondary - there is an estimated provision gap of 85 special school places and 48 SRB places in 2026/27, rising to 169 special school places and 47 SRB places in 2031/32.</p> <p>The number of places required would rise to 799 for special school provision and 126 for SRB provision in 2036/37 if the modelled scenario was extended.</p> <p>ASC SRB primary - there is an estimated provision gap of 38 SRB places in 2026/27, rising to 59 places in 2031/32.</p> <p>ASC SRB secondary - there is an estimated provision surplus of 18 SRB places in 2026/27, falling to 9 places in 2031/32.</p>	<p>learners requiring places at special schools or specialist resource bases.</p> <p>There is potential for increased traffic congestion in and around the school site at the start and end of the day.</p> <p>The proposals would require changes in the staffing structure of the school.</p>	
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				<p>The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good, and that leadership and governance is strong.</p> <p>The Council does not expect the proposals to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.</p>		
DISABILITY	X	X		<p>The proposed changes include specific provision to support learners with additional learning needs.</p> <p>The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good, and that leadership and governance is strong.</p> <p>The Council does not expect the proposals to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.</p>	<p>The proposals would have a positive impact on school age learners with additional learning needs.</p> <p>The aim of the proposed changes is to improve the match between the supply of and demand of places for specialist provision for learners with emotional health and wellbeing needs and complex learning needs.</p> <p>The options identified would provide a phased increase in the number of specialist places and would:</p>	<p>Decisions regarding which pupils would be proposed to attend the newly established provisions would be made on an individual basis.</p> <p>It is not anticipated that learners would transfer from existing specialist settings unless this is requested by their parents.</p> <p>The majority of learners begin in a mainstream class and transfer at an appropriate point to specialist education.</p>

					<ul style="list-style-type: none"> • Support a holistic, vocational and therapeutic curriculum including life skills. • Provide a mix of revolving door assessment places at KS3 and long-term placements. • Reduce reliance on independent school places, and possible out of county placements. • Ensure capacity to support looked after children in Cardiff schools, in line with the 'Closer to Home' strategy. • Establish gender-inclusive approaches to all specialist provision in Cardiff. • Increase the opportunities for primary aged learners to access specialist provision on a mainstream school site. 	<p>High quality planning and support for transition is well established in Cardiff and is tailored where necessary to the specific needs of parents and learners.</p>
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					<ul style="list-style-type: none"> • Further develop support for pupils to maintain links with and return to mainstream education where possible. • Create strong links between mainstream and special schools to support dual placements and a richer learning experience. • Improve the range of post-16 opportunities, including supported pathways to employment. <p>A change in environment can be unsettling for children which may impact on their learning and wellbeing.</p>	
GENDER REASSIGNMENT			X	There are no direct impacts arising from the proposed changes.		
RACE			X	There are no direct impacts arising from the proposed changes. In January 2025, 40.2% of learners in statutory mainstream school provision in Cardiff were recorded as Non-White-British (PLASC 2025).		

				This compares to 43.2% of statutory age learners in Cardiff special school provision (PLASC 2025).		
RELIGION, BELIEF and NON-BELIEF			X	There are no direct impacts arising from the proposed changes.		
SEX			X	There are no direct impacts arising from the proposed changes. PLASC data shows that in January 2025, 49.3% of statutory age learners attending a mainstream school in Cardiff were female and 50.7% were male.		
SEXUAL ORIENTATION			X	There are no direct impacts arising from the proposed changes.		
MARRIAGE and CIVIL PARTNERSHIP			X	There are no direct impacts arising from the proposed changes.		
PREGNANCY and MATERNITY			X	There are no direct impacts arising from the proposed changes.		

Involvement

When undertaking Equality Impact Assessments the legislation says:

*We **must** involve people who represent the interests of people who share one or more of the protected characteristics, and have an interest in the way the Council carries out our functions.*

*We may also involve or consult other people as we consider appropriate, but when considering this, we **must** have regard to the need to involve people who share one or more of the protected characteristics, and have an interest in the way the Council carries out our functions.*

In short, if the EIA has identified groups of people who are substantially impacted you must make arrangements to involve them, the people who represent them or those who advocate on their behalf.

For advice and guidance on how best to engage with different groups of people, and to help identify the most effective method(s), please contact the Cardiff Research & Engagement Centre consultation@cardiff.gov.uk. Further information and advice is also available in the [EIA guidance](#).

What arrangements have been made to involve people?

Please provide details below such as people or groups engaged with; methods of involvement e.g. surveys, focus groups, workshops, interviews, formal consultation etc.

The Council Cabinet has authorised officers to consult on the proposed change.

The consultation will include:

- publication of bilingual consultation documents outlining background, rationale and implications to parents, staff and governors of affected schools, Headteachers and Chairs of Governors city-wide, elected Members, local residents and other stakeholders
- publication of bilingual summary documents setting out the main points of the consultation documents
- publication of information in further community languages
- publication of a Welsh Language Impact Assessment
- publication of a Community Impact Assessment
- consultation meetings offered to all Governing Bodies and staff (as required) via Microsoft Teams
- consultation meetings offered in person with pupil representatives
- a public consultation meeting in person at which the proposals are explained and questions answered
- drop-in sessions in person and via Microsoft Teams where officers are available to answer questions
- letters setting out details of the proposals and where further information could be found would be sent to local residents and businesses in the areas surrounding the school sites subject to the proposed changes

- a communication campaign via social media
- a consultation response slip for return by post or e-mail available to download online at [Additional Learning Needs \(ALN\) provisions](#)
- online response forms at [Additional Learning Needs \(ALN\) provisions](#)

The views expressed during the consultation will be considered in full and inform the next stage of the process.

Monitoring Mitigating Actions

Please list any mitigating actions below. How will progress be monitored?

Please provide details of what the mitigating actions are; how the actions will be monitored to ensure they are completed, for example through Directorate Delivery Plans; when the mitigating actions are expected to be delivered; and who will be responsible for monitoring the actions.

Mitigating Action	Monitoring Arrangements	Expected Delivery Date	Responsible Officer
Access to education in Cardiff is on an equal basis. All schools operate in accordance with the requirements of the Equality Act and schools will continue to apply the Council's policies on equal opportunities.	ALN Admissions Panel; individual schools	Ongoing	
The Council would manage admissions to the specialist provision in accordance with the ALN Code.	ALN Admissions Panel	Ongoing	
Any changes would require carefully planned support to enable learners to adapt to the new setting. There would be sufficient time and well-established processes to plan and support such a transition.	Project Board/Schools/ALN Team	By expected implementation date	Project Manager
Proposals to expand /establish resource bases and special school provision would require the relevant Governing Bodies to consider the workforce requirements in readiness for the expansions/establishments.	Governing Bodies/HR	By expected implementation date	Project Manager

<p>The Governing Bodies would be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services would provide advice, support and guidance to the Governing Bodies for the workforce planning process and consequential recruitment processes.</p>	<p>Governing Bodies/HR</p>	<p>By expected implementation date</p>	<p>Project Manager</p>
<p>The Council's procedure for managing staffing changes arising from any future proposals would be used in implementing any changes. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</p>	<p>Governing Bodies/HR</p>	<p>By expected implementation date</p>	<p>Project Manager</p>
<p>Any changes to accommodation would need to consider a detailed range of information e.g., the design/accessibility of any school buildings/accommodation and appropriate actions to ensure that all provisions are accessible.</p>	<p>Project Board/SOP Team/schools</p>	<p>By expected implementation date</p>	<p>Project Manager</p>
<p>Each school location whether on a new or existing site, with new or increased demand for Learner Transport vehicles will require suitable new, improved and / or expanded facilities for drop-off and pick-up within the site. The areas required would need to accommodate appropriate numbers of vehicles which may approximate to one taxi for up to 3 pupils. In some cases, minibuses may be suitable, but this is also</p>	<p>Project Board/SOP Team/schools</p>	<p>By expected implementation date</p>	<p>Project Manager</p>

dependent on individual pupil needs, home locations and co-ordination of routes.			
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