



Equality Impact and Needs Analysis

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Southwark Special Educational Needs and Disability Strategy for children and young people aged 0-25 (2022-2025)
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Department	Children’s Services	Division	Education		
Period analysis undertaken	August 2021-August 2022				
Date of review (if applicable)	Annual: August 2023				
Sign-off		Position		Date	

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

The Southwark Special Educational Needs and Disability Strategy for children and young people aged 0-25 (2022-2025) was developed over a 12 month period, to take further the plans and direction outlined in the previous strategy.

Southwark has many reasons to be proud of the quality of its services and the educational outcomes for children and young people with SEND, and their families. There is excellent provision for these children, young people and families across our special and mainstream schools and early years' settings. We recognise that there is a need to keep pace with demand, to share best practice and improve the quality of provision further.

This strategy sets a challenging agenda for improvement: to build on the good progress made since the SEND Area Review in 2018 ([50019750 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk)) and to address the areas for action identified in that review, alongside expanding the capacity of SEND provision locally to meet the needs of children and young people from 0-25 years old. It is focused on ensuring good practice in every school and a stronger commitment to inclusion at all ages from 0-25.

Our challenge in this period is to ensure that we focus our resources on the most educationally effective provision that provides best value for money, and that we use what we know about our children and young people, and their families, to plan ahead effectively. All our children and young people with SEND deserve to have the opportunity to attend high quality provision locally, to reach their potential, and to enjoy learning.

Over the past three years, we have been working to the SEND Capital Strategy ([SEND Education Provision Strategy | Southwark Local Offer](#)) and have made significant progress in expanding the capacity of SEND provision to meet local need for children and young people 0-25 years.

Our programme for change is still operating in challenging times from a health, economic, and policy perspective. The global pandemic has placed an additional layer of complexity onto service development and family life, encouraging a necessary focus on immediate priorities, safety, and continuity of existing delivery. Southwark mobilised a multi-agency, back-to-school working group in April 2020 to support the attendance of vulnerable children (including those with SEND).

This strategy has been developed in the context of pressure on the resourcing of high needs placements as a significant issue, which has been recognised both locally and nationally. In light of this and the direction of the government Green Paper ([SEND Review - right support, right place, right time \(publishing.service.gov.uk\)](#)) we await the outcome of the national consultation and subsequent statutory changes. However, through these periods of change, it is important to state that Southwark remains committed to meeting our statutory duties and the continuous improvement of our offer for children and young people with SEND.

This current SEND strategy is a Local Authority focused document. Health partners are committed to the development of a collaborative SEND strategy for our local health, care, and educational systems, and participated in the consultation process.

The development of this strategy has been informed by all those involved in the SEND process. The views of children, young people, their families and carers as well as schools and other stakeholders were captured using a range of consultation activities, collated into a full consultation report and incorporated into this final document. In addition, throughout the process, we have maintained engagement and consulted with head teachers from special schools through the 16-25 Pathways to Adulthood board, through the ASD Review and the Early Years Strategy, and parents and carers are engaged through representation from Southwark Independent Voice on our boards.

Our SEND strategy will be reviewed regularly as the SEND landscape changes. We eagerly await the results of the consultation on the government's SEND Green Paper to inform that work.

We have used data from the census and the most recent Joint Strategic Needs Analysis (JSNA) to refer to in this document.

Included within the analysis are all children with SEN who:

- Attend primary, secondary or special schools in Southwark and live in the borough
- Are aged 3 to 18 years old
- Children with SEN population will include children with SEN and disabilities, but not children with a disability only

Excluded from the analysis:

- Children who live in Southwark but attend school outside the borough
- Young people with SEN aged 19-25 (although we do have some data on this age range with SEND from the work of the 16-25 Board, consultation with families and the overlap with the All Age Disability Service, which give us some understanding of needs/ impact).

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
<p>Key users of the department or service</p>	<ul style="list-style-type: none"> • Children (0-15 years old) and young people (16-25 years old) with identified, or unidentified, special educational needs or disabilities, either provided for within an education and health care plan (EHCP) or through SEN support within a mainstream education setting. • Parents, carers and families of those children and young people. • Schools and other education settings, whether mainstream or special, and all their staff. • Local Authority departments (Children's Social Care, Education, All Age Disability) • Health colleagues
<p>Key stakeholders were/are involved in this policy/decision/business plan</p>	<ul style="list-style-type: none"> • Children (0-15 years old) and young people (16-25 years old) with identified, or unidentified, special educational needs or disabilities, either provided for within an education and health care plan (EHCP) or through SEN support within a mainstream education setting. • Parents, carers and families of those children and young people. • School staff (mainstream and special) • Local Authority colleagues (including education psychologists, youth justice, education and health) • Health colleagues • Members of the public (via public consultation)

Section 4: Pre-implementation equality impact and needs analysis

<p>Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>This strategy will have a direct impact on provision for children and young people, aged 0-25 years old with special educational needs and disabilities. It will also directly or indirectly impact their parents, carers and families to a greater or lesser extent (all ages), their schools and communities.</p> <p>It will impact on those young people with SEND who leave provision at 26 years old as the skills they have developed and support they have received up to 25 will then have to be maintained independently or supported by other, adult/ all age provision.</p> <p>As the funding to support the provision to children and young people with SEND comes from a specific funding stream, we do not expect this strategy to have any negative impact on children or young people who do not have SEND.</p> <p>In relation to each part of the duty, we would expect the actions coming out of the strategy, and the extensive consultation we have conducted, to advance equality of opportunity and foster good community relations. By promoting the strategy widely and continuing a two way conversation with all stakeholders, we expect to further reduce discrimination, harassment and victimisation of children and young people with SEND.</p>	<p>The strategy should not have a disproportionate impact on children or young people from a more disadvantaged socio-economic background. The SEND support, EHC needs assessment and EHCP criteria are based on need, process and provision. Those at SEND support level have their needs and provision determined via their setting. For those with an EHCP, needs and provision are detailed in the plan. We need to be mindful that as there is a legal and Tribunal system around SEND, children and young people with parents, carers, or advocates from a more socio-economically advantaged background may have more success navigating the system and we need robust support systems for all parents and carers whatever their background. Our parent partnership service (SIAS) mitigate these factors.</p> <p>Parents, carers, families and children and young people themselves with lower levels of educational ability may find it difficult to understand the strategy and how it applies to them. Easy read versions will be developed.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-Economic data on which above analysis is based</p>
<p>Results from the May 2022 school census show there were 49,167 children attending Southwark schools and living in the borough. Nearly one in five of these children has special educational needs.</p> <p>79% of children with SEN receive SEN support 21% of children with SEN have an EHCP</p> <p>Age group breakdown of current EHCPs as at June 2022 (Source: internal data):</p>	<p>43% of school children (aged 4- 18 years old) with SEND support needs receive or are entitled to Free School Meals.</p> <p>52.4% of school children (aged 4-18 years old) who have an EHCP receive or are entitled to free schools meals.</p> <p>35.6% of children attending Southwark schools are entitled to or receive free school meals.</p>

Age groups	Jun-22	Rounded %
The age breakdown refers to age as at 31 Aug 2021		
Under age 5	166	6%
Aged 5 to 10	943	33%
Aged 11 to 15	946	33%
Aged 16 to 19	572	20%
Aged 20 to 25	264	9%

Mitigating and/or improvement actions to be taken	
<p>The strategy addresses the SEND cohort age range in three of the four priority areas: early years, school aged, and young people aged 16-25.</p> <p>We have already started to develop a corresponding action plan with an action work stream to support the strategy to manage the transition to independence and adulthood from 16-25 years old. This will build on the work in the strategy with adults and all- age services to ensure a smoother transition for young people with an EHCP.</p>	<p>We held focus groups for parents, carers and families (organised with Southwark Independent Voice) and for children and young people (via schools) that explained the strategy and elicited feedback and discussion.</p> <p>A simplified version of the strategy, in words and in pictures, was produced to support consultation.</p>

<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p> <p>Please note that under the PSED due regard includes:</p> <p>Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>This strategy will have a direct impact on provision for children and young people, aged 0-25 years old with special educational needs and disabilities. It will also indirectly impact their parents, carers and families to a greater or lesser extent (all ages), their schools and communities.</p>	<ul style="list-style-type: none"> There is a strong association between poverty and deprivation, and levels of disability. Children and young people with SEN are more likely to live in poverty than those without. We know that Southwark is one of the most

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In relation to each part of the duty, we would expect the actions coming out of the strategy, and the extensive consultation we have conducted, to advance equality of opportunity and foster good community relations. By promoting the strategy widely and continuing a two way conversation with all stakeholders, we expect to further reduce discrimination, harassment and victimisation of children and young people with SEND. The actions in the 4 priority areas should transform services and enable better access for our most disadvantaged families with children with SEND.

deprived local authorities in England, ranked 43rd out of 317 local authorities, and approximately 9,600 children (16%) in Southwark aged under 16 live in low income families (though this figure is based on data from 2019/20 and should be treated with caution; impacts of COVID-19 and the current cost of living pressures have likely increased this).

- We also know that children and young people with SEN are more likely to be eligible for benefits-related free school meals than other children. In 2021/22, there were nearly 13,500 children (31%) in Southwark eligible for and claiming free school meals. While levels are higher than the national average, they are comparable to our statistical neighbours.
- Nationally, 36% of pupils with special educational needs are eligible for free school meals compared to 20% of pupils without special educational needs. In Southwark, pupils with EHC plans are more likely to be eligible for free school meals than pupils on SEN support (52% compared to 43%), to indicate higher SEN is more likely for children receiving free school meals.

Equality information on which above analysis is based

Socio-economic data on which above analysis is based

Source: Draft SEND JSNA

Age Group	National Prevalence of Disability			Estimated Local Prevalence		
	Males	Females	Total	Males	Females	Total
0 to 4 years	5%	2%	4%	500	190	780

5 to 9 years	11%	6%	9%	1,120	600	1,820
10 to 14 years	13%	9%	11%	1,150	750	1,890
15 to 19 years	11%	13%	12%	850	850	1,810
20 to 24 years	15%	15%	15%	1,610	1,700	3,310
Total aged 0 to 24 years	-	-	-	5,230	4,090	9,610

Mitigating and/or improvement actions to be taken:

The strategy seeks to improve the lives of children and young people with SEND by developing more local provision to meet complex needs and ASD. This will enable easier access close to home. It seeks to transform and improve services across the age range from early years to 25 years and to smooth transition into adult services for those with lifelong conditions and needs.

Ensure commissioning plans reflect the needs of the local population:

Our commissioning team are working closely with SEND and Disability services to provide the services families need. For example, we have seen recent improvements in holiday and short break opportunities to support a more holistic approach. All services are published on the Southwark Local offer.

Gender reassignment:

- The process of transitioning from one gender to another.

Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential socio-economic impacts/needs/issues arising from socio-

	economic disadvantage (positive and negative)
This strategy does not refer explicitly to children or young people going through a transition process in their gender, nor does it refer to any particular gender. We would expect the needs of children and young people with SEND who are experiencing gender reassignment, or who identify as a gender different to that which they have been previously assigned, to be different to those not undergoing the same experience. The strategy provides an overarching framework of principles to support follow up action plans. We would expect these action plans to consider the impact of any action on gender identity and/or reassignment.	Support is not means-tested, however, anecdotally, parents/ carers from less socio-economically disadvantaged families, often have more knowledge of the system and confidence in applying for available support.
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
We do not collect information on gender identity or reassignment in children.	N/A
Mitigating and/or improvement actions to be taken	
<p>Ensure commissioning plans reflect the needs of the local population.</p> <p>Ensure that support to specific groups is targeted effectively through a variety of means, considering the needs of a range of audiences.</p>	N/A

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
The strategy has no positive or negative impact on this protective characteristic.	None anticipated.

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Marriage and or civil partnership is not legal for young people under the age of 18, or at 16 with parental consent. However, we do not know of any cases of this and the plan and support would still just apply to the individual named on it.	N/A
Mitigating actions to be taken	
Ensure commissioning plans reflect the needs of the local population.	N/A

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The strategy is for children and young people 0-25 with SEND.</p> <p>In some cases we know pre- birth that children are going to be born with SEND needs. Processes are in place for health to notify the LA about such children early so that arrangements can be made as is necessary for children with congenital disorders requiring additional support from the LA.</p> <p>In addition, some of our young people with SEND become parents themselves and require additional support from maternity, social care and education services. These situations are few but when they occur multi agency planning seeks to ensure the needs of the young person continue to be met pre and post the birth of their child. This is planned on an individual basis as required.</p> <p>We have a panel called MATch that looks at planning for such cases.</p>	<p>Parents of young children with SEND can access a variety of services from all agencies and these are set out on the Local offer and signposted by maternity and health visiting services. In this way we attempt to reduce the disadvantage some families may face and ensure they have access to services.</p> <p>When this occurs, young parents with SEND are often in socio-economic disadvantage and require support from health, social care, education, housing and other agencies.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based

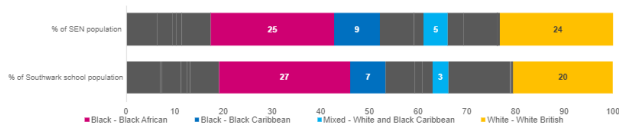
<p>We do not keep data on young parents with SEND on file so cannot report accurately on numbers. However, we are made aware of some cases each year.</p>	<p>43% of school children (aged 4- 18 years old) with SEND support needs receive or are entitled to Free School Meals.</p> <p>52.4% of school children (aged 4-18 years old) who have an EHCP receive or are entitled to free schools meals.</p> <p>35.6% of children attending Southwark schools are entitled to or receive free school meals.</p> <p>(Data source: School Census, Summer 2022)</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Ensure commissioning plans reflect the needs of the local population.</p>	<p>N/A</p>

<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>There may be challenges, based on language, or cultural acceptance, within certain communities, in accessing, or accepting, a diagnosis of SEND in a child or young person. Families may not know how to seek help or support, and/ or may not understand the information provided to them. They may find it difficult, due to beliefs about SEND, to accept a diagnosis and may not support their child/ young person effectively.</p>	<p>All impacts could be exacerbated by the intersectionality of multiple protected characteristics or disadvantage, for example by socio- economic factors.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Source: Draft SEND JSNA</p> <p>Children in Southwark’s schools:</p> <ul style="list-style-type: none"> ▪ Across England, children from the Traveller of Irish Heritage ethnic group see highest 	<p>We do not hold data which covers the intersectionality between ethnicity and socio-economic status.</p> <p>However, we can assume that at least some of the children and young people</p>

prevalence of SEN. This ethnic group make up a very small proportion (less than 1%) of the Southwark school population, so it is not expected that national ethnicity inequalities would be seen in Southwark due to different overall demographics.

- Children from Irish, Black Caribbean and mixed White and Black Caribbean ethnic groups have the highest proportion of SEN. Prevalence is lowest amongst Chinese and Indian ethnic groups.
- Most ethnic groups make up a similar share of the total population and the SEN population.
- However, there are some small outliers: children from a Black African ethnic background are less represented in the SEN population, compared to overall student population (-2% percentage point difference).
- Children from Black Caribbean, Mixed White and Black Caribbean or White British ethnic backgrounds are more represented in the SEN population, compared to overall student population (+2%, +2% +4% percentage point difference respectively).

Figure 11: Ethnic breakdown of Southwark's SEN population in comparison with Southwark's school population (segments only highlighted for ethnicities discussed above)



References

1. Department for Education. Special Educational Needs in England. June 2022

Slide 21 Southwark Council southwark.gov.uk

with SEND who are from minority ethnicities are also from socio-economically disadvantaged groups.

Mitigating and/or improvement actions to be taken

Ensure commissioning plans reflect the needs of the local population.

The development of an EHCP with families whose first language is not English can already be supported by an interpreter or translator, if required. We would expect all staff working with children and young people in Southwark to be aware of any likely cultural barriers or requirements, and/ or to find out about these if a child, young person, or family was not progressing or engaging with the process as much as they should be.

Support for families with the development of an EHCP is not means-tested and so socio-economic disadvantage should have no impact on the support a family is entitled to.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>None of our special schools have any religious affiliation. Some children with SEND may attend mainstream schools that hold a particular religious affiliation (CofE, Roman Catholic, or other) and will be expected to follow the rules and regulations of that school, as explained in its admissions guidance, with any accommodation made for pupils not of the school's faith made as outlined in the same guidance. We would expect appropriate adjustments to be made for children where their Special Educational Needs stop them from complying fully with such rules and regulations.</p>	<p>No positive or negative impacts anticipated.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>We do not collect or hold information about children and young people's religion and belief.</p>	<p>N/A</p>
Mitigating and/or improvement actions to be taken	
<p>Ensure commissioning plans reflect the needs of the local population.</p>	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Given that there is not equal representation between males and females in the SEND population, some consideration of provision and use of enough single-sex spaces might need to be applied when designing provision. The same consideration might need to be applied when considering staffing, where it is appropriate that someone of the same sex cares for a child or young person with SEND. We would expect these instances to be limited and likely only to be within special schools.</p>	<p>None anticipated as the financial impact is on the school, rather than the child/ young person.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Males are over represented in the national SEND population by 3:1. Southwark is no different. 75% of EHCPs are for boys.	N/A.
Mitigating and/or improvement actions to be taken	
Ensure commissioning plans reflect the needs of the local population.	N/A

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
We do not collect data about a child or young person's sexual orientation. However, we would expect provision for children and young people with SEND to be provided within existing health, education and social care frameworks, which all have supporting policies to ensure equality of provision regardless of sexual orientation.	None anticipated.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
We do not collect data about a child or young person's sexual orientation.	N/A
Mitigating and/or improvement actions to be taken	

Ensure commissioning plans reflect the needs of the local population.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

The 16 Articles in the Human Rights Act should all be positively impacted by the SEND Strategy. Some Articles are obviously more relevant than others to this cohort and context.

In all of our commissioning arrangements, we are acutely aware of the need to protect children and vulnerable adult from abuse or harm, particularly in residential settings. No provision is used that is less than “Good” as categorised by Ofsted and/ or the CQC and in all cases of residential placements, social care would quality assure the provider.

Information on which above analysis is based

The impacts are covered within the broader consideration of protected characteristics.

Mitigating and/or improvement actions to be taken

Mitigation is covered within the sections on protected characteristics.

Conclusions

Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:

There is a need to collect more equalities data specifically relating to this group of children and young people, within the parameters of what we are legally entitled to collect and hold on persons aged under 18 years old. It would be useful for future development and refinements of the strategy

to be able to investigate further any disproportional impact on groups with protected characteristics and to be able to ensure that resourcing is targeted most appropriately and effectively at those with the greatest need(s).

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Not enough available data on socio-economic position of children/ yp with SEND.	Cross-reference as a matter of course, data about FSM and children/ young people with SEND.	Post census (3 times per year).
2	No systematic collection and holding of information about young people with SEND who become parents.	Consider collecting data where we have access to it about young people with SEND who become parents.	As soon as is possible.
3	No systematic collection and sharing of information about numbers of babies born with congenital disorders or leaving hospital with disabilities.	Ask maternity providers to collect and share this information with us (where the numbers are large enough to make it unidentifiable).	As soon as is possible and in consultation with commissioning and public health.
4	Need assurance that all individuals with protected characteristics will have easy access to organisations that support them.	Review communications plan to ensure links to supporting agencies are provided for children/ young people and their families	New academic year
5	Absence of data about young parents with SEND or specialist provision for them.	Find out about any groups/ specialist support for young parents with SEND and make sure it is publicised on the Local Offer.	New academic year
6	Absence of raw, accurate data on disability breakdown (number, percentage of cohort, type) locally.	Ask Public Health to provide breakdown.	As soon as is possible.
7	Absence of data on intersectionality of protected characteristics and cross referencing with "life chance" impact factors (e.g. exclusions, FSM)	Set up a data group to look at cross-referencing as a matter of course, data about protected characteristics, socio-economic factors and educational attainment (including exclusions)	Post census (3 times per year).

6. Review of implementation of the equality objectives and actions

Implementation Equality Impact and Needs Analysis