

Item No.	Classification: Open	Date: 8 December 2022	Decision Taker: Deputy Leader and Cabinet Member for Children, Young People Education and Refugees
Report title:		Approval to Consult on the proposed closure of Townsend Primary School from 31 st August 2023	
Ward(s) or groups affected:		North Walworth	
From:		Nina Dohel, Director of Education	

RECOMMENDATION

1. That the Deputy Leader and Cabinet Member for Children, Young People Education and Refugees agrees to start a consultation on the proposal to close Townsend Primary School from 31st August 2023.

BACKGROUND INFORMATION

2. Townsend Primary School's rolls have decreased from 205 in 2015/16 to 131 in this financial year, a reduction of 36% of the school's roll – there are at present 79 pupil vacancies at the school, more than a third of the total. As a consequence of this substantial decrease in rolls, the school has built up a considerable deficit, which shows no prospect of being repaid. This is having a severe impact on school finances as school funding is based on the number of children on roll - while rolls are falling, schools have to continue to pay for maintenance of buildings and staffing structures for more places than pupils available. Across London and Southwark, over the last six years, primary schools have experienced a reduced take up of reception places. These falling rolls have necessitated schools and the Council to consider measures to reduce surplus capacity across primary provision e.g. to reduce the published admission number to a school's reception class where appropriate to do so.
3. Townsend Primary ended the 2021/22 financial year in a deficit position of £599k. The school had proposed and taken management action to reduce costs. As per the Southwark Scheme of Financing Schools, the school would be expected to be back in an overall financial surplus in 2026/27. However, by the end of the financial year 2026/27 the school would still remain in deficit to the sum of £316k.
4. Strategic Directors of Children and Adults and Finance and Governance met with school leaders on 13 October 2022 where it was agreed that school leaders would be unable to bring the school budget back into balance after 5 years and that all mechanisms by which financial advances could be made had been exhausted. A decision to consult on a proposed closure was confirmed in writing in November 2022.
5. The decision to consult on closure of the school comes to the Lead Member for agreement, as the Council's constitution requires Member authorisation for this type of consultation. The Council's constitution - Section 3D - Decisions for Individual Cabinet Members - item 17, page 48 states, under "Partnerships and consultation" that individual Cabinet Members are authorised to "*Agree[...] broad consultation arrangements, in relation to their areas of Responsibility*".

KEY ISSUES FOR CONSIDERATION

6. The 2022/2023 roll by year group and the vacancy rate for each are given below, but show that.

Table 2 Townsend Roll 2022/23 by Year Group

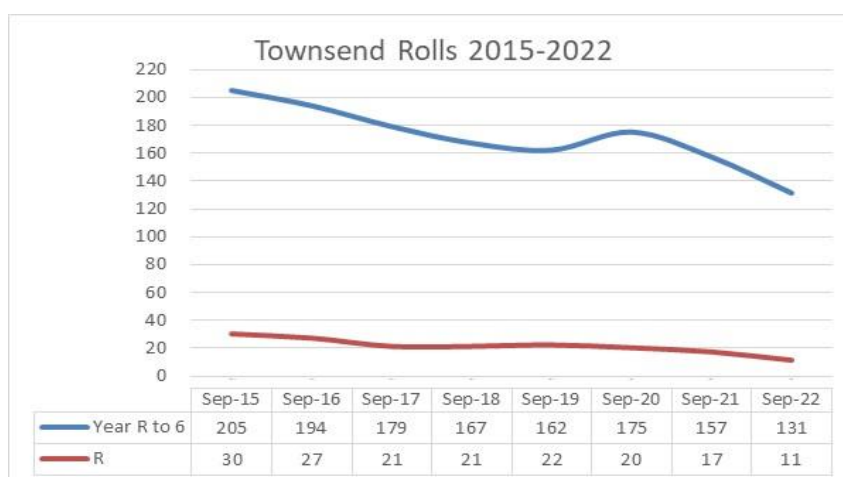
Year	R	1	2	3	4	5	6	Total
PAN 2022/23	30	30	30	30	30	30	30	210
Roll	11	17	20	16	20	25	22	131
Vacancies	19	13	10	15	10	5	8	79

7. If Townsend does not close in September 2023, the roll estimates for next year's year group totals would be as shown in the table below, with vacancies increasing to 94: 45% of the roll. If this trend continues, the school would have a roll of around 80 by September 2025, which is unsustainable financially and organisationally. A graph that shows Townsend's rolls is given below (Table 4).

Table 3 Townsend Roll 2023/24 Projected roll and vacancies by Year Group

Year	R	1	2	3	4	5	6	Total
PAN 2023/24	30	30	30	30	30	30	30	210
Projected Roll	11	11	16	19	16	19	25	116
Projected Vacancies	19	19	14	11	14	11	5	94

Table 4 Graph of Townsends rolls from September 2015 to September 2022



8. Primary school rolls have fallen dramatically in Southwark since 2015/16. By September 2023 the Council will have already removed 510 reception places (17FE) at 19 schools since 2019, but there are still 772 spare reception places (26FE) across Southwark's state funded primary schools. This represents 22% of available reception school spaces.
9. At (years R to 6) borough wide level, the picture is similar. We have seen a fall of 2,800 primary pupils (12%) over the last five years, and around 5,720 primary places - 18% of the total – presently lie vacant. This is despite removing 520 Year R to 6 places since 2019.

10. The problem is particularly acute in the Council's school place planning area 1 (PA1), which covers the Borough, Bankside and Walworth areas and has seen the biggest growth in surplus places in Southwark. Presently, there are 217 (8FE) reception places surplus in this area - 28% of all available reception places, some way above the Council average of 20%. Overall, Year R to 6 vacancies total 1,568, around 27% of available places in schools.
11. The local authority is confident that all 131 children attending Townsend School and all applicants to reception for September 2023 can be accommodated within the local area. There are currently, 560 vacant places across year groups which are within 0.6 miles of the school, four times the existing numbers on roll.

Policy framework implications

12. The Borough Plan states *We believe every child has the right to a good education, which is why we have campaigned alongside local parents for fair funding and worked with schools to drive up standards*". The proposed closure of the school would still enable all children to transition into alternative schools in the locality honouring the right to a good education for all pupils presently and potentially attending the school.
13. The reduction in pupil places that would result following closure of Townsend Primary would contribute to reduction of places and reduce oversupply. By reducing school capacity both locally and borough wide, the Council will help to ensure that schools remain viable, standards are maintained and improved, and that parents and carers still have a choice of good or outstanding schools to choose from for their children.
14. The statutory process to close a school is set out in the Department for Education's statutory guidance document 'Opening and closing maintained schools statutory guidance for proposers and decision-makers' (2019). The process includes five stages as follows:
 - *Stage one – consultation*
 - *Stage two – publication*
 - *Stage three – representation*
 - *Stage four – decision*
 - *Stage five – implementation*
15. This report is seeking permission to proceed with stage one - a consultation on the proposal to close Townsend school. The consultation will run for six weeks from 3rd January 2023 to 14th February 2023. All key stakeholders in the community will be invited to participate through attending in person and online meetings as well as, written feedback if preferred.

Risks

16. There are a number of risks that the Lead Member needs to consider. There is a risk of referral to the Office of the School's Adjudicator (OSA). Those able to object to this proposal are: The Diocesan Board of Education of any C of E diocese in the relevant area; the bishop of any Roman Catholic Church in the relevant area; the governing body or any foundation or voluntary school specified in the proposals. If a formal objection to the proposal/decision were to be raised the entire process could be delayed requiring the school to remain open until the proposal

was considered and, if refused, beyond this time. This is considered to be low risk as there is no obvious disbenefit to any schools in the relevant categories.

17. There is a very small risk that reducing school capacity prior to any increase in demand could potentially leave the Council vulnerable to legal action for not meeting its target duty to provide sufficient primary school places. The Education Act 1996 places a duty on local authorities to "*secure that there are sufficient primary [...] school places in their area as well as working to [...] increase] opportunities for parental choice*". However, the large level of vacancies and compact nature of Southwark's geography mitigate considerably against this risk.
18. There is a significant risk that, without further action, there would not be sufficient funding to provide a safe environment and appropriate curriculum. This makes taking decisive and timely action all the more important.
19. Secretary of State for Education's approval is required for site closures and this could alert them to a vacant site that could be used for a free school. Were a free school to open on the Townsend site, all the work in reducing capacity could be negated. This will be mitigated by the Council making a proposal to the Secretary of State that we intend to repurpose the buildings for other educational or non-educational use.

Community, equalities (including socio-economic) and health impacts

Community impact statement

20. The Public Sector Equality Duty, Section 149 of the Equality Act, requires public bodies to consider all individuals when carrying out their day-to-day work - in shaping policy, delivering services and as an employer.
21. Public bodies need to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between people with protected characteristics and those with none when carrying out their activities.

Equalities (including socio-economic) impact statement

22. The council's "Approach to Equality" commits the council to ensuring equality is an integral part of our daily business. "Protected characteristics" are the grounds upon which discrimination is unlawful - these are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender and sexual orientation. In this case, the characteristics covering gender reassignment, marriage and civil partnership, pregnancy and maternity, and sexual orientation are unlikely to be issues to consider in the context of a school closure.
23. An equality and health impact statement has been completed for this proposal and is attached as Appendix 1. No negative impacts in terms of equalities – including socio-economic – were identified, and therefore no mitigations were required.

Health impact statement

24. As mentioned above, an equality and health impact statement has been completed for this proposal and is attached as Appendix 1. No negative

impacts in terms of health were identified, and therefore no mitigations were required.

Climate change implications

25. Following the Council Assembly meeting on the 14 July 2021, the Council has now committed to considering the climate change implications of any decisions made. The council is developing a toolkit for staff on the council's climate change strategy. This provides guidance for staff to consider climate change impacts. Cabinet report authors are now required to detail the implications of their recommendations. This report has not directly considered the impact of climate change in the main body of the report, as the effects on climate change of the recommendation will have a minimal effect on climate change. As the numbers of pupils in the authority area falls, and the numbers of pupils attending particular schools reduce, then it is likely that less pupils will be travelling to schools, thereby potentially reducing travel (and carbon emissions) overall, and, where it is utilised, car use.
26. There will be a negligible effect on the other categories outlined - enhancing the environment and green space, green jobs and businesses, sustainable energy and reducing waste, so these are not substantively addressed in this report.
27. No direct measures have been taken to reduce or enhance the impact on climate change as part of this work, as no substantive negative effects have been identified. Additionally, as no direct measures have been taken to reduce or enhance the impact on climate change as part of this work, no monitoring will be required. As explained above, the falling numbers of pupils is likely, if anything, to have a net positive effect (albeit small) on climate change, as less pupils attend school and are therefore transported by car or other forms of transport.
28. Reducing the number of school places will not directly enhance the environment and green space, nor will it create "green" jobs and businesses, or benefit sustainable energy or reduce waste, albeit that less pupils in a particular school could potentially use less energy and produce less waste.
29. Therefore, there will be, in our opinion, no substantive negative effects as a result of the recommendations and proposals.

Resource implications

30. As admission numbers have decreased, school finances have been significantly impacted as a result. Detailed analysis of capacity across schools and identification of schools in financial difficulty was undertaken, and highlighted that further action is required to provide further mitigation and greater future proofing of schools.
31. Looking at financial assessments of schools budgets, it indicates that schools with 27 or 28 pupils per class are financially viable. For Townsend Primary School this is presently not met by a single year group – vacancies in every single year group contribute to the financial losses of the school. The school also does not possess sufficient financial reserves to be able to offset this potential loss, nor would it be capable of paying back any potential loan from the Council if one were made available. Continued

operation of the school could only add to the debts incurred by the school authority. To prevent the deficit growing, it is therefore vital that effective action to address the growing deficit is taken, as any delay will add to the already considerable debt burden.

32. Further, it is proposed that the current school site could be re-purposed for other educational or community use which would reduce the risk of the vacant education site being used for a future free school, at the Secretary of State's discretion. The creation of a new free school would create additional places in Southwark and have the knock on effect of increasing the already significant surplus capacity within the primary school sector.

Legal implications

33. The Council's general duty in relation to securing sufficient school places in its area, the legal issues that inhibit the establishment by a local authority of new maintained schools, and its functions in relation to making alterations to its existing maintained schools, is described in the body of the report.
34. Where the council is considering a proposal to close a maintained school, the Lead Member is reminded that certain proposals will be subject to statutory notification and consultation procedures under Education and Inspections Act 2006, and regulations and guidance issued under that Act.
35. The Lead Member is also reminded that the public sector equality duty under section 149 Equality Act 2010, as set out in the Community Impact section of the report, applies to the exercise any of its functions. In line with Equality and Human Rights Commission guidance, an equality and health analysis will demonstrate that the policy shows no potential for discrimination and you have taken all appropriate opportunities to advance equality of opportunity and foster good relations between people with different protected characteristics.

Financial implications

36. The Dedicated Schools Grant (DSG) Schools Block, which is allocated to fund education provision in mainstream state funded schools, is primarily calculated using pupil numbers and pupil characteristics.
37. Townsend Primary ended the 2021/22 financial year in a deficit position of £599k. The school have proposed management action to reduce costs. However, by the end of the financial year 2026/27 the school would still remain in deficit to the sum of £316k. As per the Southwark Scheme of Financing Schools, the school would be expected to be back in an overall financial surplus in 2026/27. In addition to the ongoing expenditure incurred up to the date of potential closure, one off costs as a consequence of closure (e.g. redundancies, site security, uniforms for children transferring to other schools, archiving/disposal etc.) will also be incurred.

Consultation

38. When it is proposed to close a maintained school the statutory consultation procedures defined by the DfE are required to be undertaken. This process is outlined in Appendix 2, it involves a mixture of formal and informal consultation processes that needs to be carried out by the local authority and Governing Body. Initially, this involves ensuring all stakeholder are informed of the proposals and plans to follow a statutory consultation

process., Lead Member approval is required to initiate the statutory consultation process which must run for six weeks during term time and will include meetings with parents/carers, staff, trade unions and governors, as well as local MPs, the Southwark Diocesan Board and Education Commission, and neighbouring authorities to elicit their views on the proposed closure.

39. All comments obtained through the statutory consultation process will be considered, the Lead Member will then be asked for agreement to proceed with the closure proposal. At this stage, formal notices would be issued, and the consultees (as above), as well as the general public would be invited to consider the proposals put forward to close the school.
40. The final decision to close Townsend rests with the Council's Cabinet who would meet in May 2023 to decide whether to close the school. If this is agreed, the school will formally close on 31 August 2023.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Governance

41. The Cabinet is empowered to take this decision in accordance with part 3D of the constitution. The subject matter of the consultation proposed to be undertaken, as described in this report.
42. The general duty on the council to ensure a sufficiency of school places has been referred to in the body of the report. The report advises that any specific proposals will be assessed for the impact that they might have on residents who possess one or more of the protected characteristics as defined by the Equality Act 2010.
43. The Cabinet Member is reminded that the council, in the exercise of all its functions, must have due regard (section 149 Equality Act 2010) to the need to (a) eliminate discrimination, harassment, victimisation or other prohibited conduct, (b) to advance equality of opportunity and (c) foster good relations between persons who share a relevant protected characteristic and those who do not share it. Any future equalities analysis will need to be considered in consideration of this duty.

Strategic Director of Finance and Governance (CAS22/XX)

44. The strategic director of finance and governance notes the proposal to commence consultation on the proposal to close Townsend Primary School from 1 September 2023. Maintained schools receive the majority of their funding via the Dedicated Schools Grant, which is broadly distributed on a per-pupil basis. As a result, falling rolls over a period of time can result in significantly reduced grant income, which can impact the ability of a school to balance its budget whilst maintaining teaching and learning standards at the school.
45. In the case of Townsend Primary School, the financial strain due to falling rolls is compounded by its location where there are significant surplus places across the maintained school estate. Schools in financial difficulty contribute to wider financial stresses across all maintained schools and so it is important that the financial position of all schools are reviewed regularly to ensure they are living within their means.

46. Section 22 of the Schools and Standards Framework Act (SSFA) 1998 sets out the Local Authority's responsibilities with respect to the funding of schools and includes a duty to defray all the expenses of maintaining a school. Whilst the responsibility for the financial management of the school rests with the governing body, the ultimate responsibility of maintained schools going into deficit rests with the Council and it is incumbent upon officers and members to ensure robust governance and controls are in place, both with respect to falling rolls and financial deficits, to limit any further exposure to financial risk arising from schools in deficit.

Other officers

Head of Procurement

47. No services are being procured as a result of this report, so there is no requirement for comments from the Head of Procurement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Opening and closing maintained schools - Statutory guidance for proposers and decision-makers November 2019	Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/851585/Opening_and_closing_maintained_schools1012.pdf		
Making significant changes ('prescribed alterations') to maintained schools - Statutory guidance for proposers and decision-makers October 2018	Children's & Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756572/Maintained_schools_prescribed_alterations_guidance.pdf		
School Admissions Code - Statutory guidance for admission authorities, governing bodies, local authorities, schools' adjudicators and admission appeals panels. December 2014 – DfE, and 2021	Children's & Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/389388/School_Admissions_Code_2014_-_19_Dec.pdf https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1001050/School_admissions_code_2021.pdf		
The Essential Guide to the Public Sector Equality Duty – EHRC July 2014	Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
https://www.equalityhumanrights.com/sites/default/files/psed_essential_guide_-_guidance_for_english_public_bodies.pdf		
Equalities Act 2010	Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
Link: https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty		
Southwark's Borough Plan	Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer Ric.euteneuer@southwark.gov.uk
Link: https://www.southwark.gov.uk/council-and-democracy/fairer-future/council-plan		

APPENDICES

No.	Title
Appendix 1	Equality and Health Impact Statement
Appendix 2	Decision Flow Chart

AUDIT TRAIL

Lead Officer	David Quirke-Thornton, Strategic Director of Children's and Adults' Services		
Report Author	Nina Dohel Director of Education		
Version	Final		
Dated	1 st December 2022		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
	Officer Title	Comments Sought	Comments Included
	Director of Law and Democracy	Yes	Yes
	Strategic Director of Finance & Governance	Yes	Yes
	Cabinet Member	Yes	Yes
	Date final report sent to Constitutional Team		

APPENDIX 1

Equality and health analysis for Admission arrangements for the closure of Townsend Primary School September 2023

November 2022



Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity. The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English.

Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications

Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health & wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed decision to which this equality analysis relates	Closure of Townsend Primary School				
Equality analysis author	Ric Euteneuer, Principal Strategy Officer (School Place Planning)				
Strategic Director:	David Quirke-Thornton, Strategic Director of Children's and Adults' Services				
Department	Children's & Adults	Division	Education		
Period analysis undertaken	November 2022				
Date of review	September 2023				
Sign-off		Position	Director of Education	Date	

Section 2: Brief description of decision

1.1 Brief description of decision
Southwark Council are consulting on the closure of Townsend Primary School. . Townsend Primary School is a one form entry (1FE) primary school located near the site of the former Elephant & Castle shopping centre. In recent years, the school has struggled to fill - with an admission number of 30, the school recruited around 20 pupils to reception this year and last year. The school's capacity is 210, the school currently has 164 pupils at the school, leaving 79 places - 36% of Year R to 6 places empty. This has had a considerable financial effect on the school, leading to a substantial and growing financial deficit which currently stands at £599k. The number of applicants to reception remain low and a confirmed drop in births in the immediate locality make it unlikely that pupil numbers will recover any time soon. It is therefore recommended that Southwark begin consultation on the closure of the school

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Pupils at the school Parents and carers School staff Governors Children's & Adults' Services staff
Key stakeholders were/are involved in this policy/decision/business plan	Pupils at the school School staff Governors Children's & Adults' Services staff Council Members

All schools in the authority area will be consulted with regarding the proposed consultation on closure for September 2022, alongside all local authorities in London, as well as Southwark Councillors.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in Southwark. The Public Health Team can assist with research and data.

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).																																				
Potential impacts (positive and negative) of proposed decision	Potential health impacts (positive and negative)																																			
The closure of Townsend Primary School will operate irrespective of the age of the parent(s). Children are admitted to year R in the year in which they become 5 years old for reception class and the school operate until children are 10 years old, The closure of the school would affect children of a primary age and parents/carers irrespective of age. There are no expected differential effects for children or parents/carers based on age.	There are no identified positive or negative health impacts related to age for this policy.																																			
Equality information on which above analysis is based	Health data on which above analysis is based																																			
<p>The Schools Census 2022/2, as well as roll projections and existing school capacities show that there is potentially a projected increase of spare places at <u>reception</u> in Southwark in the long term, from an excess capacity of 20% in 2021-2022 to 21% in 2026/2027.</p> <p>Vacancy levels remain above the recommended 5-10% spare capacity at reception, therefore allowing for an element of choice for applicants and not discriminating on the basis of age.</p> <p>Figures <i>in italics</i> are projections.</p> <table border="1"> <thead> <tr> <th>Year R</th> <th>Roll</th> <th>Cap</th> <th>Vac</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>2021-2022</td> <td>2,929</td> <td>3,641</td> <td>+712</td> <td>+20%</td> </tr> <tr> <td>2022-2023</td> <td>2,807</td> <td>3,581</td> <td>+774</td> <td>+22%</td> </tr> <tr> <td>2023-2024</td> <td>2,870</td> <td>3,491</td> <td>+621</td> <td>+18%</td> </tr> <tr> <td>2024-2025</td> <td>2,859</td> <td>3,491</td> <td>+632</td> <td>+18%</td> </tr> <tr> <td>2025-2026</td> <td>2,805</td> <td>3,491</td> <td>+686</td> <td>+20%</td> </tr> <tr> <td>2026-2027</td> <td>2,754</td> <td>3,491</td> <td>+737</td> <td>+21%</td> </tr> </tbody> </table> <p>For pupils of all primary school ages in Southwark, the figures show a similar pattern</p>	Year R	Roll	Cap	Vac	%	2021-2022	2,929	3,641	+712	+20%	2022-2023	2,807	3,581	+774	+22%	2023-2024	2,870	3,491	+621	+18%	2024-2025	2,859	3,491	+632	+18%	2025-2026	2,805	3,491	+686	+20%	2026-2027	2,754	3,491	+737	+21%	Not applicable
Year R	Roll	Cap	Vac	%																																
2021-2022	2,929	3,641	+712	+20%																																
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All Year	Roll	Cap	Vac	%
2021-2022	21,312	26,618	+5,306	+20%
2022-2023	20,601	26,399	+5,798	+22%
2023-2024	20,193	25,955	+5,762	+22%
2024-2025	19,802	25,541	+5,739	+22%
2025-2026	19,525	25,127	+5,602	+22%
2025-2026	19,299	24,872	+5,573	+22%

Figures below refer to admissions in the Planning Area the school is located in Figures *in italics* are projections.

Year R PA1	Roll	Cap	Vacs	%
2021-2022	588	795	+207	+26%
2022-2023	580	765	+185	+24%
2023-2024	<i>574</i>	<i>735</i>	<i>+161</i>	<i>+22%</i>
2024-2025	<i>564</i>	<i>735</i>	<i>+171</i>	<i>+23%</i>
2025-2026	<i>557</i>	<i>735</i>	<i>+178</i>	<i>+24%</i>
2026-2027	<i>548</i>	<i>735</i>	<i>+187</i>	<i>+25%</i>

R-6 PA1	Roll	Cap	Vacs	%
2021-2022	4,470	5,970	+1,500	+26%
2022-2023	4,345	5,865	+1,520	+24%
2023-2024	<i>4,344</i>	<i>5,685</i>	<i>+1,441</i>	<i>+22%</i>
2024-2025	<i>4,104</i>	<i>5,505</i>	<i>+1,401</i>	<i>+23%</i>
2025-2026	<i>4,010</i>	<i>5,325</i>	<i>+1,315</i>	<i>+24%</i>
2026-2027	<i>3,950</i>	<i>5,280</i>	<i>+1,330</i>	<i>+25%</i>

Therefore the availability of YR and primary school places is scheduled to remain above the Ofsted recommended limit of 10% for the next 5 or 6 years' time, which would imply that there would remain choice for applicants, irrespective of (primary) school age.

In terms of alternative places for pupils currently attending Townsend, the vacancies at schools within PA1 for next year are show below, with the number on roll at Townsend

Year	R	1	2	3	4	5	6	Total
Townsend	11	17	20	16	20	25	22	11
P1 Vacs	563	551	581	582	575	601	669	4,122

There is therefore room in the locality to accommodate all children affected by the closure of the school. On this basis, there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population

Mitigating actions to be taken

As there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary

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.	
Potential impacts (positive and negative) of proposed decision	Potential health impacts (positive and negative)
The closure arrangements operate irrespective of the disability status of the pupils or parent(s). Every effort will be made to accommodate children with disabilities in the schools that they are allocated after the school closes. Indeed children with disabilities are prioritised - the Council's admissions policy states that, after Looked After Children (LACs) and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school are prioritised. VA and Academy schools operating in the locality a similar policy, so the co-ordination role would follow a similar path irrespective of the status of the school	As stated opposite, children with disabilities are prioritised above pupils admitted on distance – the policy states that, after Looked After Children and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school.
Equality information on which above analysis is based	Health data on which above analysis is based
https://www.gov.uk/government/statistics/disability-prevalence-estimates-200203-to-201112-apr-to-mar	
The Office for Disability Issues has updated DWP estimates which show there are 11.6 million disabled people in Great Britain, of whom 5.7 million are adults of working age, 5.1 million are over state pension age and 0.8 million are children. 1.2 million residents of London were estimated to be disabled. Gives the latest disability prevalence within the UK. This was not broken down below sub regional geography, but this would equate to around 14.4% of the population, of whom 6.7% would be children of school age – or around 1,570 primary (4-11) aged children across the secondary schools in Southwark. The numbers of children attending Townsend who are disabled are not recorded but it is expected they will follow the national prevalence within Southwark.	
Mitigating actions to be taken	
As there appear to be no disability related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary	
Gender reassignment - The process of transitioning from one gender to another.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
No impact on gender reassignment have been identified from the closure of Townsend Primary School. Gender reassignment of pupils, parents and carers will forms no part of the closure process, nor any consequent actions, and children of primary age will not be undergoing gender reassignment	There are no identified positive or negative health impacts related to gender reassignment for this policy.

Equality information on which above analysis is based.	Health data on which above analysis is based
<p>When the GRA (Gender Recognition Act - giving birth certificate change, marriage, was passed by Parliament, related government literature at the time estimated 6,000 "visible" transsexual people in the UK.</p> <p>These were people living fully in "opposite gender" role, pre and post-ops, who had come to statistical attention through applying for Passports in their changed status, or being referred to or having passed through gender clinics and the NHS. This was therefore estimated to be 0.01% of the population or around one in 10,000 people. This was not broken down by sub national geography, but, applying this proportion to Southwark, this would equate to around 30 "transgender" residents in Southwark, across a range of ages.</p> <p>No negative impacts, with regard to gender reassignment, have been identified.</p>	Not applicable
Mitigating actions to be taken	
As no negative impacts, with regard to gender reassignment, have been identified, no mitigating actions are required	

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 couple. 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 health impacts (positive and negative)
<p>Marriage and civil partnership status would not be affected by the closure of the school, and would not disproportionately affect parents, carers, and staff of the school. Marital or civil partnership status do not form any part of the admission or recruitment process to the school, and someone's marital or civil partnership status would not affect the admission of a child to any other primary school in Southwark or other London Boroughs. .</p>	<p>There are no identified positive or negative health impacts related to marriage or civil partnership for this policy.</p>

Equality information on which above analysis is based	Health data on which above analysis is based																
<p>Data extracted from the Census 2011 shows that comparative data for Southwark, inner London, the whole of London and England at Census time; Southwark has a slightly lower percentage of residents who are married than Inner London, and lower than that as London as a whole, as well as England. For Civil partnerships, Southwark is higher than Inner London, London as a whole and England.</p> <table border="1" data-bbox="240 504 592 560"> <thead> <tr> <th>Status</th> <th>Southwark</th> <th>Inner London</th> <th>London</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Married</td> <td>28.50%</td> <td>31.00%</td> <td>39.80%</td> <td>46.60%</td> </tr> <tr> <td>Civil Partnership</td> <td>0.90%</td> <td>0.70%</td> <td>0.40%</td> <td>0.20%</td> </tr> </tbody> </table> <p>No negative impacts, with regard to Marriage and civil partnership have been identified.</p>	Status	Southwark	Inner London	London	England	Married	28.50%	31.00%	39.80%	46.60%	Civil Partnership	0.90%	0.70%	0.40%	0.20%	<p>Not applicable</p>	
Status	Southwark	Inner London	London	England													
Married	28.50%	31.00%	39.80%	46.60%													
Civil Partnership	0.90%	0.70%	0.40%	0.20%													
Mitigating actions to be taken																	
<p>As no negative impacts, with regard to marriage and civil partnership have been identified, no mitigating actions are required</p>																	
<p>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.</p>																	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)																
<p>Pregnancy and maternity would not affect the parents, carers, as neither pregnancy nor maternity status form part of, or are disproportionately affected by the closure process. No negative or positive health or equality impacts have been identified</p>																	
Equality information on which above analysis is based	Health data on which above analysis is based																
<p>Southwark's birth rate has declined in 2019, but the last comparative statistics published by ONS for London and England showed that Southwark has a lower level of births per 1000 women, and less births per woman than England and London overall.</p> <p>Southwark residents are having proportionately less children than in London or England. 2021 ONS birth figures are outlined below</p> <table border="1" data-bbox="233 1541 914 1686"> <thead> <tr> <th></th> <th>Southwark</th> <th>London</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Live births</td> <td>3,525</td> <td>104,162</td> <td>642,828</td> </tr> <tr> <td>GFR*</td> <td>50.9</td> <td>60.1</td> <td>55.8</td> </tr> <tr> <td>TFR**</td> <td>1.33</td> <td>1.60</td> <td>1.61</td> </tr> </tbody> </table> <p>* General Fertility Rate (GFR) number of live births per 1,000 women aged 15-44 ** Total Fertility rate(TFR) number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan</p> <p>No negative impacts, with regard to this policy have been identified</p>		Southwark	London	England	Live births	3,525	104,162	642,828	GFR*	50.9	60.1	55.8	TFR**	1.33	1.60	1.61	<p>Not applicable</p>
	Southwark	London	England														
Live births	3,525	104,162	642,828														
GFR*	50.9	60.1	55.8														
TFR**	1.33	1.60	1.61														

Mitigating actions to be taken

As no negative impacts, with regard to Pregnancy and Maternity have been identified, no mitigating actions are required

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

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

The closure will have no disproportionate negative impact for pupils of any race at Townsend Primary School, nor for their ability to obtain a place for their children as an alternative. Reception and In Year Admissions are undertaken irrespective of the race or ethnicity status of the child or parent(s).

Potential health impacts (positive and negative)

There are no identified positive or negative health impacts related to race for this policy.

Equality information on which above analysis is based

Southwark has a considerably higher non-White population than England and London as a whole. The Townsend school population is more diverse than the school population at large, as a number of BME families have arrived in Southwark in recent years. The non-White UK part of the school population is **92.7%**

Health data on which above analysis is based

Not applicable

Ethnicity	Number	%
Black African	56	27.3%
White UK	15	7.3%
Any other White	22	10.7%
Other ethnic group	18	8.8%
Any other Mixed	12	5.9%
Black Caribbean	14	6.8%
Any other Black	30	14.6%
White/Caribbean	11	5.4%
White/Black African	2	1.0%
Bangladeshi	13	6.3%
White/ Asian	0	0.0%
Any other Asian	6	2.9%
Asian - Chinese	0	0.0%
Asian - Indian	4	2.0%
Asian - Pakistani	0	0.0%
White - Irish	0	0.0%
Arab	0	0.0%
Traveller Irish	0	0.0%
Gypsy/Roma	1	0.5%
Total Non-White UK	189	92.7%

Figures for all primary schools across Southwark in terms of ethnicity are shown below

Ethnicity	Number	%
Black African	5,935	26.5%
White UK	5,067	22.6%
Any other White	2,166	9.7%
Other ethnic group	1,621	7.2%
Any other Mixed	1,498	6.7%
Black Caribbean	1,467	6.6%
Any other Black	1,287	5.8%
White/Caribbean	739	3.3%
White/Black African	503	2.2%
Bangladeshi	491	2.2%
White/ Asian	382	1.7%
Any other Asian	366	1.6%
Asian - Chinese	313	1.4%
Asian - Indian	164	0.7%
Asian - Pakistani	158	0.7%
White - Irish	101	0.5%
Arab	82	0.4%
Traveller Irish	21	0.1%
Gypsy/Roma	15	0.1%
Total Non-White UK	17,309	77.4%

The evidence shows that the school is more ethnically diverse than primary schools in Southwark, as whole and that schools are more diverse than the school age population,

Around 60% of Southwark's school age population are non-white, compared to 66% of the school aged population for primary, and 93% for Townsend.

Ethnicity	Number	%
Black African	47,413	16.4%
White British	114,534	39.7%
Black Caribbean	17,974	6.2%
Other White	35,330	12.2%
Other ethnic group	7,013	2.1%
Any other Mixed	5,411	1.8%
Any other Black	12,124	4.2%
White/Caribbean	5,677	1.9%
Bangladeshi	2,912	1.3%
White/Black African	3,687	1.2%
Any other Asian	7,674	2.6%
White/Asian	3,003	1.4%
Chinese	8,074	2.8%
Pakistani	1,623	0.5%
Indian	5,819	2.1%
Irish	6,222	2.1%
Arab	2,440	0.8%
Gypsy/Roma	263	0.1%
Total Non-White UK	173,704	60.3%

<p>Southwark has a more diverse population than inner London and London as a whole, and a considerably higher non-White population than England. The school population is more diverse than the population at large, as a number of families have arrived in Southwark in recent years, so the older population is less diverse than the younger population. This is reflected in the school population in particular</p> <p>As the primary proportion of BME population considerably exceed their prevalence in the population, this would seem to indicate that there is no direct or indirect bias operating in terms of admissions to schools.</p> <p>There is therefore no evidence that the admissions policy and co-ordination process discriminates against BME residents. No negative impacts, with regard to race, have therefore been identified</p>	
<p>Mitigating actions to be taken</p>	
<p>As no negative impacts, with regard to race have been identified, no mitigating actions are required</p>	

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>Admission arrangements for community schools operate and admit children irrespective of the religion of the child or parent(s). In year admissions to community schools operate in the same way.</p> <p>For VA schools with religious admissions criteria, children meeting certain religious criteria will be given priority in admissions. That said, where VA schools are operating with vacancies, they are not allowed to “reserve” these ongoing vacancies for children of faith, and children will be admitted regardless of faith to VA schools with vacancies, where a preference has been expressed.</p>	<p>There are no identified positive or negative health impacts related to race for this policy.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>No religious affiliation for schools or across Southwark is collected as part of the school census programme, so we have no record of religious observance in Southwark at a school or borough level, outside the Census 2011. .</p>	<p>Not applicable</p>

The Christian population of Southwark is 52.5%, the under 15 population is 53.7%. This would seem to indicate that the religious diversity of the children and the general population are similar and the impact is therefore likely to be minimal.

The Southwark VA primary school population is 25% of all pupils. However, it is recognised that not every Christian parent wants a religious education for their child.

The high level of vacancies at VA primary schools (19%) against that for community schools (13%) would seem to indicate that there were sufficient places at religious school for children who required them. Whilst on the face of it, this would seem to indicate a need for more religious based education in Southwark, the same view is taken as for primary schools – that not every religious parent wants a Christian education for their child, and that new Christian schools would primarily be abstractive of existing school places rather than meeting an unmet need.

An indication from the Census 2011 of the Religion of those aged 0 to 15 is given below Southwark (LBS), Inner London (IL), London(L), England (E).

Religion	LBS	IL	L	E
Christian	53.7%	42.0%	43.6%	50.5%
Buddhist	0.8%	0.6%	0.6%	0.3%
Hindu	0.7%	1.6%	4.6%	1.5%
Jewish	0.2%	2.2%	2.0%	0.5%
Muslim	13.7%	24.6%	19.8%	8.8%
Sikh	0.1%	0.4%	1.5%	0.9%
Other religion	0.2%	0.2%	0.3%	0.2%
No religion	20.2%	16.7%	18.2%	29.5%
not stated	10.4%	11.7%	9.5%	7.9%

Southwark has a higher proportion of Christians than London, Inner London, and England as a whole, and a lower percentage of Muslims than London and Inner London (though above the English average. Figures for “No religion” are higher than London and inner London, but lower than the national average.

No negative impacts, with regard to religion or belief, have therefore been identified

Mitigating actions to be taken

As no negative impacts, with regard to religion have been identified, no mitigating actions are required

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
As the gender split at Townsend and primary schools at large in Southwark are equally split, no negative consequences as to gender resulting from the closure or subsequent reallocation of places if the school closes have been identified. All our primary school places are co-educational, like all other state-funded primaries in Southwark. The in year primary admissions policy therefore has no impact on gender imbalance	There are no identified positive or negative health impacts related to sex for this policy.
Equality information on which above analysis is based	Health data on which above analysis is based
The proportion of boys and girls in primary schools are split 50%:50% by gender (Source: SCAP return 2021), which matches the prevalence in the local population (Source ONS Census 2011).	Not applicable
Mitigating actions to be taken	
As no negative impacts, with regard to religion have been identified, no mitigating actions are required	

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	Potential health impacts (positive and negative)
The proposed admissions arrangements operate irrespective of the sexual orientation of the parent(s) or pupils	There are no identified positive or negative health impacts related to sexual orientation for this policy.
Equality information on which above analysis is based	Health data on which above analysis is based
The Integrated Household Survey undertaken in 2010 revealed that almost three-quarters of a million UK adults say they are gay, lesbian or bisexual - equivalent to 1.5% of the population. This was not broken down by sub national geography, but applying this proportion to the number of residents in Southwark, this would equate to around 4,000 LGBTQ inhabitants in Southwark. No negative impacts, with regard to sexual orientation, have been identified	Not applicable
Mitigating actions to be taken	
As no negative impacts, with regard to religion have been identified, no mitigating actions are required	
Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in Southwark. Socio economic status is the measure of an area's, an individual's or family's economic and social position in relation to others, based on income, education, health, living conditions and occupation.	

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>The proposed admissions arrangements operate irrespective of the socio economic status of the parent(s) or pupils. Socio-economic status forms no part of the closure process, nor subsequent reallocation of places, and the demographic and economic profile of the school and the surrounding area, and the schools that children will potentially be allocated to are very similar. Therefore no identified negative effects as a result of the closure have been identified.</p>	<p>There are no identified positive or negative health impacts related to socio economic status for this policy.</p>
Equality information on which above analysis is based	Health data on which above analysis is based
<p>The deprivation scores for the surrounding areas are similar to the area where the school is situated.</p> <p>Southwark ranked as 41st most deprived borough out of the 326 local authorities in England. This is a relative improvement from previous rankings (26th in 2007 and 17th in 2004). Southwark has also moved up to being the 12th most deprived borough in London in 2010, from 6th in 2004 and 9th in 2001.</p>	<p>Not applicable</p>
Mitigating actions to be taken	
<p>As no negative impacts, with regard to socio economic status have been identified, no mitigating actions are required</p>	
<p>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</p>	
Potential impacts (positive and negative) of proposed decision	
<p>The 16 rights are: Right to life, Freedom from torture and inhuman or degrading treatment; Right to liberty and security; Freedom from slavery and forced labour; Right to a fair trial; No punishment without law; Respect for your private and family life, home and correspondence; Freedom of thought, belief and religion; Freedom of expression; Freedom of assembly and association; Right to marry and start a family; Protection from discrimination in respect of these rights and freedoms; Right to peaceful enjoyment of your property; Right to education; and a Right to participate in free elections</p> <p>The “right to an education” for children in Southwark will not be affected by the</p>	

proposed closure of the school, given the number of vacancies that exist for Townsend pupils to be reallocated to, should the school close

Information on which above analysis is based

The website below gives guidance to the 16 articles and individual details for each <http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act>

No negative impacts with regard to human rights have been identified

Mitigating actions to be taken

As regards the admission arrangements - no negative impacts with regard to human rights, have been identified, so no mitigating actions are required

Section 5: Further actions and objectives

Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no actions will derive from these specific proposals.			
Number	Description of issue	Action	Timeframe
N/A	N/A	N/A	N/A

Equality objectives (for business plans)				
Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no equality objectives will derive from these specific proposals.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

Health objectives (for business plans)				
Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no health objectives will derive from these specific proposals.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

APPENDIX 2 – DECISION FLOW CHART

Closure of Townsend Primary School

Process stage	Key Dates	DfE Statutory requirements and remarks
i) Agreeing consultation proposal to put to school	October to November 2022	None
ii) Informal consultation with schools and parents	November 2022 to end of December 2022	None.
iii) Cabinet member decision (IDM) agreeing to statutory consultation	By 16 th December 2022	None
iv) Statutory consultation period	January 3 rd 2022 to February 14 th 2023	4-6 weeks consultation. “At least 4 weeks” is in the guidance <i>Publication in local press and if possible, on the school website</i>
v) IDM decision agreeing to publish statutory proposals	February 2023	None
vi) Publication of statutory proposals and representation period	March 2023 to April 2023	Publication must be within 12 months of the statutory consultation period being complete. Representation period must last for 4 weeks - and will need to be in term time
vii) Cabinet final decision following statutory proposals	April or May 2023	Cabinet decision must be within 2 months of the end of the representation period.
viii) Implementation	31 st August 2023	None, but expected to be no longer than 2 years after Cabinet decision