



***Equality and health
analysis for the
closure of Comber
Grove Primary
School in August
2024***

April 2024

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 effect 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 Socio-Economic implications, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering socio-economic impacts in all equality analyses, not forgetting to include identified potential mitigating actions. Similarly, it is important for the Council to consider the impact of its policies and decisions in relation to tackling the climate emergency. This includes both the potential carbon emissions of a policy or decision and its potential effect on the borough’s biodiversity. You are asked to consider the impact on climate of your policy and decision under discussion by competing the Climate impact section below.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		The proposed closure of Comber Grove Primary School on the 31 st August 2024			
Equality analysis author		Ric Euteneuer			
Strategic Director:		David Quirke-Thornton			
Department		Children & Adult Services	Division	Education	
Period analysis undertaken		April 2024			
Date of review (if applicable)		Not applicable, final decision			
Sign-off	Alasdair Smith	Position	DCS	Date	

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

2.1 Brief description of policy/decision/business plan

Comber Grove Primary School is a one form of entry (1FE) primary school, on Comber Grove, London SE5 in the Camberwell locality. Since 2017, the school has struggled to fill, and the school's PAN was reduced to 30 in 2019 to try and match supply to demand. Since then, school has not been able to fill the 30 places it is able to admit each year. In 2023-24 academic year, 14 children initially took up Reception class places, 16 joined Reception the previous year. Only 13 families applied to Reception for 2024-25. With no projected growth in the near future, this low level of admissions will have an increasing financial and organisational impact on the school, ultimately impacting on resources available to offer children a good quality education. Given the vacancy levels in the vicinity of the school, the consideration of closure proposals is recommended.

Section 3: Overview of service users and key stakeholders consulted

3. Service users and stakeholders

Key users of the department or service	<ul style="list-style-type: none">• Children (3-11 years old) attending a primary, infants, juniors or attached nursery setting in Southwark• Parents, carers and families of those children.• School staff (teaching or non-teaching)• Governors of those schools• Local Authority departments (Children's Services, Education)
Key stakeholders were/are involved in this policy/decision/business plan	<ul style="list-style-type: none">• Head teachers of all primary schools in Southwark• Governors of all primary schools in Southwark• Ward Members of the Council• Leadership teams in Education and Children's and Adults' services• Finance, Sustainable development, Schools' HR, Legal, Communications colleagues

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based, any mitigating actions to be taken and importantly any improvement actions to promote equality and tackle inequalities. It is important to also understand impacts as including needs of different groups. **Due regard is about considering the needs of different protected characteristics in relation to each part of the duty as relevant and proportionate to the area at hand.**

An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

It is important to consider any actions which can be considered to advance equality of opportunity through positive actions, for example. The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). 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 socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- *poverty*
- *health*
- *education*
- *limited social mobility*
- *housing*
- *a lack of expectations*
- *discrimination*
- *multiple disadvantage*

The public sector equality duty (**PSED**) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- *Always work to make Southwark more equal and just*
- *Stand against all forms of discrimination and racism*

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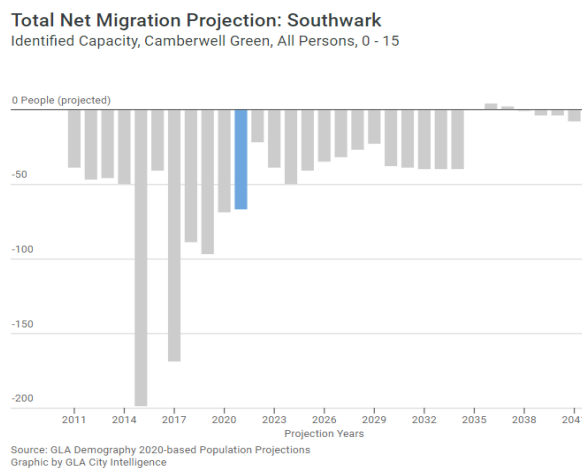
Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages –e.g. 18 - 30 year olds).																																																																																																																
Potential impacts (positive and negative) of proposed 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 closure of Comber Grove Primary School could ostensibly reduce choice for parents wanting a secular education in the locality for their child. It could potentially affect all age groups from 4-11 (children) and parents (generally 18-50) differentially. This, however, does not take into acct the</p> <p>1) <i>i) reduction in pupils numbers and applications for the school</i></p> <p><i>ii) reduction in the births in the locality</i></p> <p><i>iii) the outmigration of children from the locality and Southwark as a whole</i></p> <p>Due to i), ii) and iii), there has been a considerable fall in demand for places at the school, and numbers have fallen to an extent that a 1 form entry (1FE) school is no longer viable to staff and run. Therefore, the loss of “choice” will largely be theoretical. Around 70% of the pupils at the schools live in the Camberwell Green ward – there are 4 other primaries in the ward, 3 of them community schools</p>	<p>As outlined in the adjacent “<i>potential impacts (positive and negative) of proposed policy</i>” column, the potential socio-economic impacts of closing the school as regards to age will be minimal. Closing the school will not effectively change the intake and relative demographics of the children attending other schools in the locality.</p> <p>As most of the pupils attending the school live locally, and this is the case with other local schools, the closure of Comber Grove will not in itself change the local demographics or socio-economic profile.</p>																																																																																																															
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based																																																																																																															
<p>2) <i>i) The reduction of pupil numbers at the school is self-evident – there has been a near 52% loss of pupils (127 children) since 2019 (<i>Source, School Censuses 2019-24</i>)</i></p> <table border="1"> <thead> <tr> <th>Year</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>35</td> <td>24</td> <td>38</td> <td>45</td> <td>39</td> <td>42</td> <td>44</td> <td>267</td> </tr> <tr> <td>2020</td> <td>26</td> <td>32</td> <td>24</td> <td>36</td> <td>42</td> <td>36</td> <td>41</td> <td>237</td> </tr> <tr> <td>2021</td> <td>25</td> <td>24</td> <td>27</td> <td>23</td> <td>35</td> <td>39</td> <td>35</td> <td>208</td> </tr> <tr> <td>2022</td> <td>28</td> <td>27</td> <td>25</td> <td>24</td> <td>16</td> <td>34</td> <td>37</td> <td>191</td> </tr> <tr> <td>2023</td> <td>16</td> <td>23</td> <td>28</td> <td>26</td> <td>21</td> <td>18</td> <td>31</td> <td>163</td> </tr> <tr> <td>2024</td> <td>14</td> <td>14</td> <td>20</td> <td>21</td> <td>19</td> <td>19</td> <td>19</td> <td>126</td> </tr> </tbody> </table> <p>In terms of applications for the school, the numbers show a steep fall overall both in terms of first choices and choices overall</p> <table border="1"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>20</td> <td>21</td> <td>12</td> <td>8</td> <td>8</td> </tr> <tr> <td>All</td> <td>67</td> <td>61</td> <td>51</td> <td>32</td> <td>31</td> </tr> </tbody> </table>	Year	R	1	2	3	4	5	6	Total	2019	35	24	38	45	39	42	44	267	2020	26	32	24	36	42	36	41	237	2021	25	24	27	23	35	39	35	208	2022	28	27	25	24	16	34	37	191	2023	16	23	28	26	21	18	31	163	2024	14	14	20	21	19	19	19	126	Year	2021	2022	2023	2024	2025	1 st	20	21	12	8	8	All	67	61	51	32	31	<p>The Camberwell Green ward Census 2021 data shows that the same percentage of the population aged 0-19 lives in the ward (21%) than live in the borough (21%). The under 4 component of the ward population has fallen by 281 (26%) since 2011, and the 5-9 cohort by 191 children (21%). Overall, under 19s have fallen by 9% since the last census.</p> <table border="1"> <thead> <tr> <th>Age</th> <th>2011</th> <th>2021</th> <th>+/-</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>0-4</td> <td>1,082</td> <td>801</td> <td>-281</td> <td>-26%</td> </tr> <tr> <td>5-9</td> <td>909</td> <td>718</td> <td>-191</td> <td>-21%</td> </tr> <tr> <td>10-14</td> <td>738</td> <td>855</td> <td>+117</td> <td>+16%</td> </tr> <tr> <td>15-19</td> <td>735</td> <td>792</td> <td>+57</td> <td>+8%</td> </tr> <tr> <td>0-19</td> <td>3,464</td> <td>3,166</td> <td>-298</td> <td>-9%</td> </tr> </tbody> </table> <p>(Source ONS Census 2021)</p>	Age	2011	2021	+/-	%	0-4	1,082	801	-281	-26%	5-9	909	718	-191	-21%	10-14	738	855	+117	+16%	15-19	735	792	+57	+8%	0-19	3,464	3,166	-298	-9%
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(Source, Applications–records - LBS 2019-2024)

ii) the school is situated in the “Camberwell Green” ward of the Council, and takes 73% of its pupils come from this ward. A further 5% comes from other Camberwell wards, and 10% from Planning Area 1 (Borough, Bankside & Walworth), and 8% come from other LAs – mainly Lambeth. All of these localities have seen a reduction in births over the last 5 years, and this is projected to continue in the near future (Source, ONS Census and Birth data 2021-22)

Overall the under 19 component of the population has fallen and the 0-4 cohort are the future primary pupils in the ward, therefore it is likely that pupil numbers in this ward will continue to fall (Source, ONS Census 2021)

iii) In terms of outmigration, there has been net outmigration of pupils aged from 0-15 in recent years, and this continues to be the case – the net migration figures by age below (GLA migration estimates, 2023) up to 2035



Mitigating and/or improvement actions to be taken

As there have been no other differential negative impacts relating to age identified, no other mitigating or improvement actions are proposed.

Di-ability - A person has a disability if s/he has a physical or mental impairment, which has a substantial and long-term adverse effect on th’t person's ability to carry out normal day-to-day activities. Please note that under the PSED due regard includes:

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 disable’ persons' disabilities.” This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

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)
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The closure of Comber Grove Primary School will have a minor effect on disabilities, as the facilities, adaptations and services offered at the	There will be little or no potential socio-economic impacts arising from socio-economic disadvantage as regards
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<p>school for pupils and staff will be available at schools to which they may move.</p> <p>There could be disruption in routines for children with higher needs as a result of moving schools. There are 2 children with EHCPs attending Comber Grove. All children with EHCPs will be offered an alternative suitable placement to meet their needs, with detailed transition plans put in place to support their move.</p>	<p>disability, as schools in the locality are as accessible as Comber Grove and there are numerous school within close travelling distance of the school</p>															
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which analysis is based</p>															
<p>No central record of disability is maintained by the LA, but a proxy measure is the number of children with Education and Healthcare Plans (EHCPs), or children who have been identified as SEND Plus. Comber Grove Primary has a slightly lower level of EHCPs than for England, London and Southwark. The SEND Support percentage is slightly above local, and above regional and national averages.</p>	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with disabilities, no data has been identified.</p>															
<table border="1"> <thead> <tr> <th>Type</th> <th>CGPS</th> <th>LBS</th> <th>LDN</th> <th>Eng.</th> </tr> </thead> <tbody> <tr> <td>EHCP</td> <td>1.4%</td> <td>4.0%</td> <td>4.1%</td> <td>4.0%</td> </tr> <tr> <td>SEND Support</td> <td>15.8%</td> <td>16.6%</td> <td>11.7%</td> <td>12.6%</td> </tr> </tbody> </table>	Type	CGPS	LBS	LDN	Eng.	EHCP	1.4%	4.0%	4.1%	4.0%	SEND Support	15.8%	16.6%	11.7%	12.6%	
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EHCP	1.4%	4.0%	4.1%	4.0%												
SEND Support	15.8%	16.6%	11.7%	12.6%												
<p><i>(Source, School Census January 2024 - EHCPs and SEN Support, DfE Statistics 2023)</i></p> <p>In terms of staffing, no register of staff disability is maintained – disability does not form part of the selection process for staff recruitment or redundancy, so is unlikely to affect disabled staff disproportionately. In England, in the 2021 Census, a smaller proportion but larger number of people were disabled (17.7%, 9.8 million), compared with 2011 (19.3%, 9.4 million). In Southwark, the prevalence of disabled people in 2021 was higher (18.6%) than for England (17.7%) and London (15.8%).</p>																
<p>Mitigating and/or improvement actions to be taken</p>																
<p>If the decision is taken to close the school the LA will work with children displaced by the closure to find an appropriate placement at the numerous schools with vacancies local to where they live, including those with EHCPs or classified as SEND plus. Individual support will be provided to children with disabilities including reviewing Education, Health and Care Plans and discussing transition arrangements between schools. No other differential negative impacts relating to age have been identified, so no further mitigating or improvement actions are proposed in this category.</p>																

<p>Gender reassignment: - The process of transitioning from one gender to another.</p> <p>Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's recorded sex or can differ from it.</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>Gender reassignment is unlikely to involve children of primary age but the appropriate support would be provided to any child to whom this applies. As regards staffing, gender reassignment would form no part of the recruitment or indeed the redeployment process, so would not negatively impact on staffing.</p>	<p>There will be minimal socio-economic impacts/ needs/ issues arising from socio-economic disadvantage resulting from gender reassignment.</p>
<p>Equality information on which above analysis is based.</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Data is not collected for children, parents or carers on gender reassignment, though numbers are likely to be small. In the 2021 Census, 0.6% of the UK population identified themselves as not having the same gender they were born with. In London, this rose to 1.4%, and Southwark, 1.2%. (Source, ONS Census 2021)</p>	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with gender reassignment, no appropriate or useful data has been identified.</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>As there have been no negative impacts relating to gender reassignment identified, no mitigating or improvement actions are proposed.</p>	
<p>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.)</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Marriage or civil partnership would not directly involve children of primary age, although they may be the children of married or unmarried parents or civil partners. The marital status of the parents or carers of school pupils forms no part of the admissions process for schools.</p> <p>As regards staffing, no records of the marital status of Comber Grove staff are kept at the school at present, but, in any event the marital or civil partnership status of a staff member or potential applicant would form no part of the recruitment or indeed any redeployment process.</p>	<p>As mentioned in the adjacent "potential impacts of the proposed policy", the marital status of the parents or carers of school pupils forms no part of the admissions process. Children are admitted based on sibling presence, medical needs or distance criteria alone. Therefore there are no realistic socio-economic impacts, needs or issues arising from socio-economic disadvantage relating to marital status</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based												
<p>No records are maintained on the marital or civil partnership status of parents & carers, or staff members of Comber Grove Primary School.</p> <p>Figures at a ward, borough, regional and national level for the percentage of the local population by marital and civil partnership status are given below. Camberwell Green ward is slightly higher than the Southwark average, but some way adrift on London and England averages (<i>Source, ONS Census 2021</i>)</p> <table border="1" data-bbox="240 611 911 730"> <thead> <tr> <th>Area</th> <th>%</th> <th>Area</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Camberwell Green</td> <td>28.8</td> <td>England</td> <td>44.5</td> </tr> <tr> <td>Southwark</td> <td>26.4</td> <td>London</td> <td>39.7</td> </tr> </tbody> </table>	Area	%	Area	%	Camberwell Green	28.8	England	44.5	Southwark	26.4	London	39.7	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with marital status, no appropriate or useful data has been identified.</p>
Area	%	Area	%										
Camberwell Green	28.8	England	44.5										
Southwark	26.4	London	39.7										
Mitigating actions to be taken													
<p>As there have been no differential negative impacts relating to marriage or civil partnership status, no mitigating or improvement actions are proposed.</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; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from disadvantage (positive and negative)												
<p>Pregnancy and maternity are unlikely to directly involve children of primary age.</p> <p>As regards staff, Comber Grove staff's contracts mean that they are paid for some of their pregnancy and maternity leave; the pregnancy status of a staff member or potential applicant would form no part of the recruitment or indeed the redeployment process, so would not negatively impact on staffing.</p>	<p>As mentioned in the adjacent "<i>potential impacts of the proposed policy</i>", pregnancy /maternity status of the parents or carers of pupils forms no part of the admissions process, and children are admitted based non-maternity-based criteria alone. This status would not form part of a recruitment process. There are no socio-economic impacts, needs or issues arising from disadvantage relating to pregnancy or maternity status</p>												
Equality information on which above analysis is based	Socio-economic data on which above analysis is based												
<p>Fertility is measured at a range of rates and geographies by the ONS. These include the "GFR" and "TFR". The "<i>General Fertility Rate (GFR)</i>" is the number of live births per 1,000 women aged 15-44. The Total Fertility Rate (TFR) is the number of births per woman aged 15-44</p>	<p>As there is no perceptible potential socio-economic impacts/needs/issues arising from socio-economic disadvantage for people with pregnancy or maternity status, no appropriate or useful data has been identified.</p>												

Area	GFR	TFR
Southwark	44	1.11
Inner London	48	1.16
London	56	1.41
England	56	1.49

(Source, GLA/ONS 2022 (latest figures))
 Southwark has low fertility rate compared the rest of London and England. This is another explanation, together with outmigration – why pupil numbers in Southwark are falling.

Mitigating and/or improvement actions to be taken

As there have been no negative impacts relating to pregnancy or maternity status identified, no mitigating or improvement actions are proposed.

<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 disadvantage (positive and negative)</p>
<p>A potential impact of the proposed closure could be that the pupils from a Global Ethnic Majority (GEM) background could be disproportionately affected. They could potentially be placed in less diverse schools than the school proposed for closure. Presently, the school is 71.2% Global Ethnic Majority (i.e. non-White UK & Unknown) – For the local ward (Camberwell Green), the GEM population is 68.2%. For the planning area the school is in (planning area 4 – PA1), the total percentage of GEM pupils is 67.8%. For the schools within 0.75 miles of Comber Grove, the percentage GEM is 74.4%. As a whole, Southwark primary pupils are 74.7% GEM. As regards of Southwark’s population as a whole is 62.5%. The likelihood is that children will be re-accommodated in local schools in PA4 or Lambeth, and that these schools broadly share the same or greater level of diversity that the school presently has. There is no evidence therefore to show that closing the school would be likely to change the ethnic make-up of local alternative schools, as schools in the same planning area are as diverse as Comber Grove. In terms of staffing, the school’s workforce will – over time – find work in other local schools. As race will not form part of the selection process of staff, then no discernible differential effects as regards race will be noted or action required.</p>	<p>A potential impact of the closure could be that the school becomes less diverse socio-economically than it is at present.</p> <p>This is thought unlikely, as there has been no major development near the school, and the school’s intake is predominately from PA4.</p> <p>What is evident is that people in Southwark are having less children, and those that are tend to be from the families that have remained, and are the same socio-economic class as the present parents and carers – just fewer of them.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based																																																																																																									
<p>A table giving the relative percentages of the local population at schools and in the locality is given below.</p> <p>Comber Grove's percentage of non-White British pupils is slightly lower than the planning area and Southwark primary pupil population, but still relatively high, even for London</p>	<p>The School Census 2024 figures opposite show that the school population is at a similar level of diversity as the (school) population at large</p>																																																																																																									
<table border="1"> <thead> <tr> <th data-bbox="225 517 592 696">Group</th> <th data-bbox="592 517 683 696">Comber Grove</th> <th data-bbox="683 517 778 696">Schools within 0.75 miles</th> <th data-bbox="778 517 874 696">PA4 school pupils</th> <th data-bbox="874 517 954 696">Southwark primary pupils</th> </tr> </thead> <tbody> <tr><td>Bangladeshi</td><td>3.6%</td><td>3.1%</td><td>1.9%</td><td>2.4%</td></tr> <tr><td>Indian</td><td>0.7%</td><td>0.6%</td><td>0.7%</td><td>0.9%</td></tr> <tr><td>Pakistani</td><td>0.0%</td><td>1.3%</td><td>0.9%</td><td>0.8%</td></tr> <tr><td>Other Asian Background</td><td>2.2%</td><td>1.8%</td><td>2.0%</td><td>1.9%</td></tr> <tr><td>Black African</td><td>19.4%</td><td>32.8%</td><td>30.4%</td><td>24.8%</td></tr> <tr><td>Black Caribbean</td><td>5.0%</td><td>7.1%</td><td>6.9%</td><td>6.1%</td></tr> <tr><td>Any Other Black Background</td><td>5.8%</td><td>4.0%</td><td>4.0%</td><td>4.1%</td></tr> <tr><td>Chinese</td><td>2.2%</td><td>0.8%</td><td>0.6%</td><td>1.0%</td></tr> <tr><td>Mixed - White & Black African</td><td>2.2%</td><td>2.1%</td><td>1.8%</td><td>2.2%</td></tr> <tr><td>Mixed - White & Caribbean</td><td>2.2%</td><td>3.6%</td><td>3.3%</td><td>2.0%</td></tr> <tr><td>Mixed - White & Asian</td><td>0.7%</td><td>1.3%</td><td>1.3%</td><td>7.0%</td></tr> <tr><td>Any Other Mixed Background</td><td>4.3%</td><td>5.4%</td><td>4.9%</td><td>6.5%</td></tr> <tr><td>White British</td><td>5.8%</td><td>12.6%</td><td>17.0%</td><td>20.5%</td></tr> <tr><td>White Irish</td><td>0.0%</td><td>0.2%</td><td>0.3%</td><td>0.5%</td></tr> <tr><td>Gypsy / Roma</td><td>0.0%</td><td>0.2%</td><td>0.1%</td><td>0.1%</td></tr> <tr><td>Traveller of Irish Heritage</td><td>0.0%</td><td>0.0%</td><td>0.0%</td><td>0.1%</td></tr> <tr><td>Any Other White Background</td><td>14.4%</td><td>6.9%</td><td>6.1%</td><td>9.3%</td></tr> <tr><td>Any Other Ethnic Group</td><td>8.6%</td><td>8.5%</td><td>8.9%</td><td>8.1%</td></tr> <tr><td>Unknown / Missing</td><td>23.0%</td><td>7.7%</td><td>8.9%</td><td>4.8%</td></tr> <tr><td>GEM (Non-White British + Unknown)</td><td>71.2%</td><td>74.4%</td><td>67.8%</td><td>74.7%</td></tr> </tbody> </table> <p>(Source, Pupil Census, 2024)</p>	Group	Comber Grove	Schools within 0.75 miles	PA4 school pupils	Southwark primary pupils	Bangladeshi	3.6%	3.1%	1.9%	2.4%	Indian	0.7%	0.6%	0.7%	0.9%	Pakistani	0.0%	1.3%	0.9%	0.8%	Other Asian Background	2.2%	1.8%	2.0%	1.9%	Black African	19.4%	32.8%	30.4%	24.8%	Black Caribbean	5.0%	7.1%	6.9%	6.1%	Any Other Black Background	5.8%	4.0%	4.0%	4.1%	Chinese	2.2%	0.8%	0.6%	1.0%	Mixed - White & Black African	2.2%	2.1%	1.8%	2.2%	Mixed - White & Caribbean	2.2%	3.6%	3.3%	2.0%	Mixed - White & Asian	0.7%	1.3%	1.3%	7.0%	Any Other Mixed Background	4.3%	5.4%	4.9%	6.5%	White British	5.8%	12.6%	17.0%	20.5%	White Irish	0.0%	0.2%	0.3%	0.5%	Gypsy / Roma	0.0%	0.2%	0.1%	0.1%	Traveller of Irish Heritage	0.0%	0.0%	0.0%	0.1%	Any Other White Background	14.4%	6.9%	6.1%	9.3%	Any Other Ethnic Group	8.6%	8.5%	8.9%	8.1%	Unknown / Missing	23.0%	7.7%	8.9%	4.8%	GEM (Non-White British + Unknown)	71.2%	74.4%	67.8%	74.7%	
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<p>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.</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>The removal of 30 places from a school with no religious foundation could potentially remove choice and the availability of secular primary places in Southwark and beyond. Additionally, guidance when deciding this type of decision requires us to consider the balance of religious places in the borough</p> <p>However the effect on the provision of secular places is likely to be minimal given the availability of spare places in many similar schools nearby.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p> <p>There is no evidence of impacts arising from socio-economic disadvantage relating to religion and belief in relation to this decision.</p>

As regards staffing, selection of staff for alternative employment is unlikely to be affected by the religion of the staff member, as, barring the Head and Deputy at some religious schools, religious observance in other Southwark or Lambeth schools is not a requirement.																																																							
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<p>The percentages of religious/non-religious places (Non-VA) in Southwark are given in the table below, both before (2022 and 2023) and after the proposals in 2025. As a percentage of places this is as shown below. Figures <i>in italics</i> are estimates Secular places (Non-VA remain at around 70% throughout)</p> <table border="1" data-bbox="240 616 874 723"> <thead> <tr> <th>Type</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>VA</td> <td>30%</td> <td>29%</td> <td>31%</td> <td>31%</td> </tr> <tr> <td>Non-VA</td> <td>70%</td> <td>71%</td> <td>69%</td> <td>69%</td> </tr> </tbody> </table> <p>The percentage <u>uptake</u> of places are shown below.</p> <table border="1" data-bbox="240 786 874 893"> <thead> <tr> <th>Type</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>VA</td> <td>25%</td> <td>24%</td> <td>24%</td> <td>24%</td> </tr> <tr> <td>Non-VA</td> <td>75%</td> <td>76%</td> <td>76%</td> <td>76%</td> </tr> </tbody> </table> <p>This shows the <u>demand</u> for secular places has increased, but only by +1% of pupils overall. As noted above, there is no requirement for staff to be of a particular religion or none and therefore no record of staff's religious belief is maintained. It is therefore unlikely that a school closure will have any discernible effect on secular/non-religious education in Southwark as regards staffing and as regards pupil choice. Similarly, any restructuring as regards staff is also unlikely to have repercussions on any particular religious group or another.</p>	Type	2022	2023	2024	2025	VA	30%	29%	31%	31%	Non-VA	70%	71%	69%	69%	Type	2022	2023	2024	2025	VA	25%	24%	24%	24%	Non-VA	75%	76%	76%	76%	<p>Non-religious parents may wish for a secular education, but this is unlikely to be based on socio-economic background. The table below of the level of religious observance extracted from the 2021 Census. No breakdown of Christian faith is recorded for Camberwell Green (CG) ward. No religious register is kept of staff or pupils.</p> <table border="1" data-bbox="949 741 1485 1086"> <thead> <tr> <th>Religion</th> <th>CG</th> <th>Southwark</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>48%</td> <td>46%</td> </tr> <tr> <td>Buddhist</td> <td>1%</td> <td>1%</td> </tr> <tr> <td>Hindu</td> <td>1%</td> <td>10%</td> </tr> <tr> <td>Jewish</td> <td>0.2%</td> <td>0%</td> </tr> <tr> <td>Muslim</td> <td>12%</td> <td>7%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> <td>0%</td> </tr> <tr> <td>Other/ No religion/ not stated</td> <td>39%</td> <td>37%</td> </tr> </tbody> </table> <p>(Source, ONS Census 2021)</p> <p>This shows that there is a slightly higher level of Christian and Muslim religious belief in the Camberwell Green, but no solid conclusions can be drawn from this.</p>	Religion	CG	Southwark	Christian	48%	46%	Buddhist	1%	1%	Hindu	1%	10%	Jewish	0.2%	0%	Muslim	12%	7%	Sikh	0.1%	0%	Other/ No religion/ not stated	39%	37%
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Sex - A man or a woman.	
<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>If there was a significant imbalance in the provision or uptake of places at the school then the closure of the school may affect this. Prevalence of male to female pupils in both the school and in the locality are approaching 50:50, so the school closing will not have an effect on the mix of pupils in terms of gender.</p> <p>As regards staffing, a large proportion of the staff are female, as is common for primary schools of any type across the UK. Sex will not form part of the selection process of staff seeking alternative employment so no discernible differential effects as regards sex are expected.</p>	<p>There are no potential socio-economic impacts or issues arising from disadvantage as regards the closure of the school with respect to the gender of pupils or staff.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based																																								
The percentage of girls to boys varies from year to year. At Y2-Y5, there are more boy than girls, in Y6 more girls than boys. Overall, numbers are 40% girls to 60% boys, though this varies on a year-to-year basis.	The number of female staff on the workforce are generally high. It is not felt that the closure therefore will disproportionately affect women more than men, other than there are more female staff																																								
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HR support will be provided to the predominately female staff through the closure process. No other mitigating actions in respect of sex are proposed.																																									
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At age 4-11, children may not have expressly identified with one sexuality or another, but they may have parents or carers who are LGBTQ+. In either case, school admissions do not take into account the sexuality of the child or parent/carer. Closing the school will therefore have no differential effect on parents whatever their sexuality. Similarly, with regard to staff, sexuality or sexual orientation forms no part of the selection for recruitment or redundancy, so a closure will not disproportionately affect staff members as regards their sexual orientation.	There are no potential socio-economic impacts or issues arising from disadvantage as regards the closure of the school with respect to the sexual orientation of pupils, parents/carers or staff.																																								
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The prevalence of different sexualities was covered in the 2021 Census for the first time. This is not (yet) available at a ward level, but the figures for Southwark show the following figures for the population over 16.	As mentioned above, there are no potential socio-economic impacts as regards the closure of the school or issues arising from disadvantage with respect to the sexual orientation of pupils, parents/carers or staff. The figures for prevalence are given in the column adjacent to this one.																																								
<table border="1"> <thead> <tr> <th>Area</th> <th>Straight or Heterosexual</th> <th>Gay or Lesbian</th> <th>Bisexual</th> <th>Pansexual</th> <th>Asexual</th> <th>Queer</th> <th>All other sexual orientations</th> <th>Not answered</th> <th>Non heterosexual</th> </tr> </thead> <tbody> <tr> <td>Southwark</td> <td>82.71</td> <td>4.53</td> <td>2.57</td> <td>0.67</td> <td>0.07</td> <td>0.17</td> <td>0.06</td> <td>9.21</td> <td>8.07</td> </tr> <tr> <td>London</td> <td>86.19</td> <td>2.23</td> <td>1.52</td> <td>0.37</td> <td>0.05</td> <td>0.06</td> <td>0.04</td> <td>9.54</td> <td>4.27</td> </tr> <tr> <td>England</td> <td>89.37</td> <td>1.54</td> <td>1.29</td> <td>0.23</td> <td>0.06</td> <td>0.03</td> <td>0.02</td> <td>7.46</td> <td>3.17</td> </tr> </tbody> </table>	Area	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered	Non heterosexual	Southwark	82.71	4.53	2.57	0.67	0.07	0.17	0.06	9.21	8.07	London	86.19	2.23	1.52	0.37	0.05	0.06	0.04	9.54	4.27	England	89.37	1.54	1.29	0.23	0.06	0.03	0.02	7.46	3.17	
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As there have been no negative impacts relating to sexual orientation identified, no mitigating or improvement actions are proposed or required.																																									

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
In respect of the 16 rights listed, the proposal to close Comber Grove will not affect any of those listed. This said, the “First Protocol”, this states “ <i>The first sentence of Article 2 of Protocol No. 1 guarantees an individual right to education. The second guarantees the right of parents to have their children educated in conformity with their religious and philosophical convictions</i> ”. Closure of Comber Grove Primary School, removing a single form of entry would not endanger this freedom, as there are numerous school places available in schools within walking distance of Comber Grove, both religious and non-religious. This proposal will also not affect the rights of staff members.
Information on which above analysis is based
At the last census time in January 2024, there were 4,790 spare places in Southwark primary schools, including 903 spare places in Planning Area 4, 22% for each respectively. For non-religious education, there are numerous alternative schools very close to Comber Grove with numerous spare places available
Mitigating and/or improvement actions to be taken
As there have been no negative impacts relating to human rights identified, no mitigating or improvement actions are proposed or required.

Conclusions

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

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
As no mitigating or improvement actions to promote equality and tackle inequalities have been proposed, no further actions are required or proposed			

5.1 Equality and socio-economic objectives (for business plans)				
Based on the initial analysis above, please detail any of the equality objectives outlined above 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.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

6. Review of implementation of the equality objectives and actions

As no further actions to promote equality and tackle inequalities have been required or proposed, no further reviews of **the equality objectives and actions** are required

7. Implementation Equality Impact and Needs Analysis

No issues as regards equalities and needs have been identified – therefore no mitigating or improvement actions to promote equality and tackle inequalities have been proposed as a result of this analysis.
