

BLACK COUNTRY FEDERATION

# EQUALITY & PSED INFORMATION AND EQUALITY OBJECTIVES

Brockmoor Primary School • Brierley Hill Primary School



|                     |                                                               |
|---------------------|---------------------------------------------------------------|
| POLICY OWNER        | Senior Leadership Team                                        |
| APPROVED BY         | Governing Body                                                |
| APPROVAL DATE       | September 2026                                                |
| REVIEW DATE         | September 2027, or earlier if legislation or guidance changes |
| EQUALITY OBJECTIVES | September 2026 to August 2030                                 |
| PUBLISHED           | Both school websites                                          |

Aspiration and opportunity for every child

# EQUALITY & PSED INFORMATION AND EQUALITY OBJECTIVES

Black Country Federation | September 2026

Ambition | Success | Perseverance | Independence | Respect | Excellence

|                                |                                                                                                                                                                                                      |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Status</b>                  | Statutory published information                                                                                                                                                                      |
| <b>Applies to</b>              | Brockmoor Primary School and Brierley Hill Primary School                                                                                                                                            |
| <b>Annual PSED information</b> | Updated at least annually                                                                                                                                                                            |
| <b>Equality objectives</b>     | Reviewed during the period and republished at least every four years                                                                                                                                 |
| <b>Accountability</b>          | Governing Body, supported by Executive Leadership                                                                                                                                                    |
| <b>Related documents</b>       | SEND Policy and SEN Information Reports; Accessibility Plans; Relational Behaviour Policy; Attendance Policy; PSHE and RSHE Policy; Safeguarding Policy; Pupil Premium Strategies; Complaints Policy |

## 1. Purpose and statutory context

The Black Country Federation is committed to ensuring that every pupil and adult is treated with dignity and respect, can participate fully in school life and is not disadvantaged by unlawful discrimination. Equality is not a separate initiative. It is considered through curriculum, teaching, behaviour, safeguarding, SEND, attendance, personal development, employment and the decisions made by leaders and governors.

Section 149 of the Equality Act 2010 places the Public Sector Equality Duty (PSED) on the governing bodies of maintained schools. In exercising their functions, they must have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not;
- foster good relations between people who share a relevant protected characteristic and those who do not.

The specific duties require schools to publish information demonstrating compliance with the PSED at least annually and to publish one or more specific and measurable equality objectives at least every four years. This document provides the Federation's published information for 2026/27 and its equality objectives for 2026-2030.

## 2. Protected characteristics and the school context

The Equality Act 2010 identifies nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The way particular provisions apply varies by context. For example, age is not a protected characteristic for pupils in schools, although it is relevant to employment; marriage and civil partnership is relevant to the PSED in relation to eliminating unlawful discrimination. The Federation considers its duties carefully rather than treating all characteristics as interchangeable.

The Federation also pays close attention to disadvantage, SEND, EAL, care experience and other barriers to participation or achievement. These are not all protected characteristics in themselves, but they can intersect with protected characteristics and are central to our commitment to equality of opportunity.

### 3. Our current equality context

The two schools share one governing body and a common commitment to high expectations, but they have different cohorts and starting points. Equality information is therefore considered at school level as well as federation-wide. The figures below are current September 2026 context indicators held by the Federation; they are not presented as a complete profile of every protected characteristic.

| Indicator                                   | Brockmoor (BRK)                                           | Brierley Hill (BH)                                                           |
|---------------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------------|
| Number on roll                              | 435                                                       | 197                                                                          |
| Minority ethnic background                  | 52.0%                                                     | Current school data monitored                                                |
| English as an additional language           | 39.8%                                                     | 36.0%                                                                        |
| SEND                                        | 20.2%                                                     | 12.2%                                                                        |
| Targeted FSM / socio-economic context       | 38.9% targeted FSM                                        | 46.3% targeted FSM                                                           |
| 2025/26 equality-relevant improvement focus | Disadvantaged attendance/PA; SEND access and independence | Disadvantaged attainment/attendance; prerequisite knowledge and independence |

Some protected-characteristic data is sensitive and, in a primary school, small numbers can make individuals identifiable. We therefore publish proportionate information and do not publish breakdowns where this could compromise privacy. Leaders and governors use appropriate internal information, pupil and family voice, incident data, attendance, participation and outcomes to understand whether particular pupils or groups experience disadvantage.

### 4. How we demonstrate due regard

#### 4.1 Eliminate discrimination, harassment and victimisation

- Apply clear safeguarding, relational behaviour and anti-bullying expectations, with discriminatory language, harassment and harmful behaviour challenged and followed up.
- Record significant behaviour and safeguarding concerns through the appropriate systems so patterns can be identified and acted upon.
- Make reasonable adjustments for disabled pupils and consider SEND, communication, sensory, health and other individual needs when applying school systems.
- Review policies, curriculum decisions, uniform, trips, enrichment, admissions-related practice and access arrangements for unintended barriers or less favourable treatment.
- Use safer recruitment and fair employment practices and respond appropriately to concerns raised by staff, pupils or families.

#### 4.2 Advance equality of opportunity

- Maintain high curriculum ambition while providing adaptive teaching, reasonable adjustments and additional or different provision where assessment shows this is needed.
- Use the Universal SEND Offer, Learning Plans and Curriculum Entitlement Pathway so pupils with significant prerequisite gaps can secure knowledge, increase independence and access more of the wider curriculum meaningfully.
- Analyse attainment, attendance, persistent absence, participation and wider opportunity at group and pupil level, including disadvantaged pupils and pupils with SEND, rather than relying only on whole-school averages.
- Remove barriers to enrichment, leadership, visits, sport, cultural experiences and wider personal development wherever they are identified.
- Use pupil premium and other resources in response to diagnosed barriers, evaluating whether provision changes outcomes and participation.

#### 4.3 Foster good relations

- Teach pupils, in an age-appropriate way, about respect, difference, protected characteristics and healthy relationships through the curriculum and wider personal development.
- Use literature, curriculum content, assemblies and wider experiences to broaden pupils' understanding of different people, communities, cultures and perspectives.

- Develop pupil leadership, collaboration and restorative approaches so pupils learn to listen, repair harm and participate positively in a diverse community.
- Challenge stereotypes and prejudice rather than avoiding difficult issues, while ensuring teaching remains age-appropriate, factual and balanced.

## 5. Equality in decision-making

Due regard must be exercised when decisions are made; it is not satisfied simply by publishing this document. Leaders and governors therefore consider equality implications as part of significant decisions about curriculum, staffing, provision, behaviour, attendance, access, enrichment and resource deployment. The level of analysis is proportionate to the decision and the evidence available.

When a significant decision could affect access, participation or outcomes, leaders should be able to answer: Who may be affected? Is there evidence of a disparity or particular need? Could the decision create or deepen a disadvantage? What reasonable adjustment or proportionate action is required? How will we know whether the decision improved equality of opportunity?

## 6. Evidence used to evaluate equality

The Federation does not treat activity as evidence of impact. Equality evaluation draws on a proportionate combination of:

- attainment, progress and curriculum evidence;
- attendance, persistent absence and punctuality;
- SEND provision, independence and access to the curriculum;
- behaviour, bullying, discriminatory and safeguarding records;
- participation in clubs, trips, pupil leadership, sport, enrichment and wider opportunities;
- pupil, parent/carer and staff voice;
- complaints and concerns where these identify an equality issue;
- recruitment, employment and workforce information where relevant and lawful;
- quality assurance and leadership evaluation of whether actions have changed pupils' experience or outcomes.

Data is interpreted carefully. Small cohorts, overlapping needs and individual circumstances can make simple group comparisons misleading. Where a difference is identified, leaders investigate the underlying evidence before deciding on action.

## 7. Current equality priorities: what the evidence tells us

### Brockmoor Primary School

Brockmoor serves a diverse community: 52.0% of pupils are from minority ethnic backgrounds, 39.8% speak English as an additional language and 20.2% have SEND. Current school evaluation identifies strong overall outcomes alongside a continuing attendance disparity for disadvantaged pupils and the need to ensure pupils with SEND gain knowledge, independence and meaningful access to the universal curriculum. These are the principal equality-of-opportunity issues that require sustained attention during 2026/27.

### Brierley Hill Primary School

Brierley Hill's current evaluation identifies a different starting point. 46.3% of pupils are in the targeted FSM group and 36.0% speak English as an additional language. The most significant current disparity is for disadvantaged pupils: 2025/26 disadvantaged KS2 combined attainment was 37%, with reading at 58% and mathematics at 53%; disadvantaged attendance was 94.3% compared with 96.8% for non-disadvantaged pupils and persistent absence was 19.8% compared with 9.2%. The school is responding through stronger responsive teaching, precise diagnosis, additional Year 6 capacity and the Curriculum Entitlement Pathway where pupils have significant prerequisite gaps.

These priorities do not imply that other protected characteristics are less important. Leaders continue to monitor the full range of equality duties and will revise action where evidence identifies a different or emerging disparity.

## 8. Equality objectives 2026-2030

The governing body has adopted the following objectives because they are connected to current evidence, capable of being measured and focused on pupil experience and outcomes. They will be reviewed at least annually alongside the published PSED information. Actions may change as evidence changes; the intended equality outcome remains the test.

| Objective                                                                                                                                                                                                                                 | Why this matters                                                                                                                                                                                                 | How impact will be evaluated                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Reduce identified disparities in attendance and persistent absence, with particular focus on disadvantaged pupils and any protected-characteristic group for whom school evidence shows a material gap.</b>                         | Access to education is a prerequisite for equality of opportunity. Current evidence identifies disadvantage-related attendance gaps across BCF, with a particularly significant gap at BH.                       | School and group attendance/PA trends; case-level evidence of barriers removed; narrowing material gaps without masking individual need.                                                                             |
| <b>2. Improve equitable curriculum access, independence and achievement for pupils with SEND and disabled pupils.</b>                                                                                                                     | Reasonable adjustments and additional provision should increase learning and participation, not create unnecessary adult dependence or a parallel low-ambition curriculum.                                       | Learning Plan and pathway reviews; pupil work and discussion; independence; access to home-class/universal curriculum; attainment/progress from starting points; pupil and family voice.                             |
| <b>3. Reduce material attainment disparities where current evidence identifies them, with an immediate focus on disadvantaged pupils at Brierley Hill while sustaining strong outcomes and monitoring group differences at Brockmoor.</b> | BH 2025/26 evidence shows significant disadvantage-related weakness in KS2 combined, reading and mathematics. Equality action must respond to evidence rather than assume the same issue exists at both schools. | Statutory and internal assessment; quality of work; retention and application of prerequisite knowledge; disadvantaged/non-disadvantaged differences considered alongside cohort size and individual need.           |
| <b>4. Ensure pupils experience an inclusive culture in which prejudice and discrimination are challenged and access to wider opportunities is equitable.</b>                                                                              | Equality is also experienced through belonging, safety, representation, relationships and participation beyond academic outcomes.                                                                                | Discriminatory/bullying incident patterns and follow-up; pupil voice; participation in enrichment, leadership, trips and clubs; curriculum/RSHE evidence; evidence of action where disproportionality is identified. |

## 9. Annual review and accountability

The governing body retains accountability for the Federation's compliance with the Equality Act 2010 and the PSED. Executive leaders ensure that equality considerations are embedded in day-to-day leadership and that governors receive sufficient information to challenge impact.

At least annually, leaders will update the published equality information and review progress against these objectives. The review will not ask only whether actions were completed. It will ask what changed for pupils, whether any disparity narrowed, whether access or participation improved, whether improvement is consistent, and what should happen next.

Where evidence shows that an objective is no longer the highest priority, the Federation may adapt its actions or publish a revised objective before the end of the four-year period. New objectives will be published no later than 2030.

## 10. Responsibilities

| Role                                          | Responsibility                                                                                                                                         |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governing Body</b>                         | Ensure due regard is exercised in governance and decision-making; approve and monitor equality objectives; receive annual evidence of PSED compliance. |
| <b>Executive Leadership</b>                   | Set culture and expectations; ensure equality implications are considered in significant decisions; evaluate disparities and the impact of action.     |
| <b>SENCO / inclusion and pastoral leaders</b> | Support reasonable adjustments, SEND/disability access, targeted support, pupil/family voice and analysis of barriers.                                 |

| Role                           | Responsibility                                                                                                                              |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Curriculum and subject leaders | Ensure curriculum ambition, representation, access and teaching do not create avoidable barriers; evaluate participation and learning.      |
| All staff                      | Treat pupils and colleagues fairly and with dignity; challenge prejudice and discrimination; implement agreed adjustments; report concerns. |
| Pupils                         | Show respect for others, report concerns and contribute to an inclusive school community.                                                   |
| Parents/carers                 | Share relevant information, raise concerns promptly and work with the school to support equitable access and participation.                 |

## 11. Accessibility, complaints and publication

This information is published on both school websites. A paper copy will be provided free of charge on request. The Federation will make reasonable adjustments to the format where required to support accessibility.

Concerns about equality, discrimination or the implementation of this document should be raised with the school in the first instance. Safeguarding concerns must be reported through safeguarding procedures. Formal complaints are considered under the Federation Complaints Policy; this does not remove any legal rights available under the Equality Act 2010.

## 12. Key legislation and guidance

- Equality Act 2010, including section 149 (Public Sector Equality Duty).
- Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, as applicable.
- Department for Education: Equality Act 2010: advice for schools.
- Department for Education: What maintained schools must or should publish online.
- Maintained schools: governance guide.
- SEND Code of Practice: 0 to 25 years and duties concerning disabled pupils and reasonable adjustments.
- Current statutory guidance for Relationships Education, Relationships and Sex Education and Health Education, where relevant to teaching respect and protected characteristics.

**The Federation will operate in accordance with the most recent legislation and statutory guidance. Where national requirements change, current law and statutory guidance take precedence until this document is formally updated.**

## Appendix A - Annual PSED review prompts

1. What does current evidence show about access, participation, safety, attendance and outcomes for different groups?
2. Where is there a material disparity, and what is the most plausible explanation?
3. What action was taken, and was it proportionate to the identified need?
4. What has changed for pupils as a result?
5. Are reasonable adjustments effective and promoting increasing independence?
6. Do behaviour, bullying or safeguarding records show any pattern of prejudice, harassment or disproportionality?
7. Are pupils able to access enrichment, leadership and wider opportunities equitably?
8. What do pupils and families tell us about belonging, respect and barriers?
9. What should be sustained, adapted or stopped?
10. Does the published equality information now need updating?