

The Equality Act and the Pupil Premium Grant – tensions, synergy and convergence

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Summary

A slightly shorter version of this article appeared in *Race Equality Teaching*, volume 31 number 1, autumn 2012. It starts by quoting some documentation issued by a primary school in England in autumn 2012 about its use of the pupil premium grant (PPG). It then recalls the PPG's political and legal background and notes that so far very little official guidance has been issued about how the grant should be used.

It points out, though, that both the DfE and Ofsted have issued guidance relating to equalities more generally and have implied that the principles and specific requirements of the Equality Act can clarify and strengthen planning about how to use and evaluate the PPG. Seven topics are itemised as requiring further consideration and clarification.

In the light of these, sharp but supportive questions and implied suggestions could be put to schools by someone who is committed to the letter and spirit of equalities legislation, and to genuine socio-economic justice in and through the education system.

The article closes by referring briefly to the review of the Equality Act's general and specific duties that is currently being conducted by the Government Equalities Office.

Documentation at one school

'Dear Parents,' writes the headteacher of a primary school in October 2012, 'you will remember the letters I have sent to you over the past two years encouraging you to apply for free school meals even if you do not want your child to have a school lunch. The reason I have done this is to ensure that our school receives the maximum amount of funding possible.'¹

The headteacher then goes on to explain that in 2011/12 the level of the pupil premium grant (PPG) was £430 per pupil for pupils eligible for free school meals, and for pupils in care who have been continuously looked after for six months. It was increased to £600 per pupil in 2012/13 and extended to include all pupils who have been eligible for free school meals at any point in the last six years. She mentions further that the government has announced it is going to increase the grant for the year 2013/14 to £900 per eligible pupil. 'You can see,' she concludes, 'how important it is that we access this money so that we can continue to focus on raising the achievement of all the pupils at our school.'

The school in question has 404 pupils, of whom 173 are eligible for the PPG. At £600 per pupil the school's current grant is £103,800. The school's website reports that it is being used for the following items of expenditure:

- after-school tuition for pupils in years 5 and 6
- focus groups from teachers to address gaps in learning
- additional teacher in years 5 and 6 for numeracy and literacy, thus creating smaller class groups
- one-to-one support for children not making expected progress in reading in years 1 and 2

- o two half-term schools and an Easter school for year 6 to raise achievement at levels 4 and 5, and to increase progress from key stage 1
- o homework books and revision guides for year 6 in maths, English and science
- o An interactive maths programme licence for all children.

The website also lists the following specific and measurable objectives:

- o raise the attainment and progress of children in years 5 and 6 who are not on track to make two levels of progress from the end of key stage 1, in order to ensure 100 per cent of children make expected progress
- o increase the percentage of children attaining the standard in the year 1 phonics test to 80 per cent
- o ensure that an increased percentage of children reach the expected standard in reading at the end of key stage 1, focusing on the 27 per cent of children who fell below the standard in year 1.

This article is about the many questions which arise. They can be summarised and focused as follows:

1. If you were engaged as a consultant or critical friend to advise and assist this school, what questions would you ask to support the headteacher and her staff in their efforts, and to extend their thinking and approach?
2. If you were inclined to be more critical than friendly, for example because you were a government inspector, or because you were committed to humanistic and socialist views of education and to the implementation in Britain of the Equality Act 2010, what questions would you ask with a view to challenging this headteacher, and headteachers of schools in similar circumstances and thinking along similar lines?
3. What messages about the pupil premium grant, and about the practical working-out of the Equality Act 2010, do you wish to send a) to the current government and b) to the current opposition?

The article has three parts. First, the PPG's political and legal background is recalled and it is noted that so far very little official guidance has been issued about how the grant should be used, and about the kinds of searching question about its use which schools ought to consider. Second, it is recalled that both the DfE and Ofsted have issued guidance relating to equalities more generally and have implied that the principles and specific requirements of the Equality Act can clarify and strengthen planning about how to use and evaluate the PPG. It follows that the requirements of equalities legislation and of the PPG programme can be and should in certain respects be combined and harmonised, so that each set of requirements is informed and enriched by the other. Third, seven topics are itemised as requiring further consideration and clarification. In the light of these seven topics, sharp but supportive questions and implied suggestions could be put to the school described above by someone who is not only friendly but also committed to the letter and spirit of equalities legislation, and to genuine socio-economic justice in and through the education system.

Legal and political background of the PPG

The pupil premium grant in England was an iconic key pledge in the Liberal Democrat manifesto in 2010 and was fundamental in the Lib Dems' negotiations with the Conservative Party when the coalition was created in May 2010. In 2011–12 total funding was £625m. This was increased to £1.25bn for 2012–13 and to £1.65bn, or £900 per child, for 2013/14. By 2015 it is intended that the total should be £2.5bn a year. The average amount received by all schools nationally in 2011–12 was £30,940 and the median was £19,520.² An average-sized secondary school with the average

proportion of pupils from low-income backgrounds would have received around £77,000. An average-sized primary school with the average proportion of pupils from low-income backgrounds would have received around £23,000.³ You can see, to recall the headteacher's letter to parents quoted above, how important it is that schools access this money so that they can continue to focus on raising the achievement of all pupils. Not only from the point of view of individual schools but also from that of the coalition government, particularly the Lib Dems, it is crucial that the PPG should be seen to be successful.⁴

Children living in low-income households, reported Ofsted in September 2012 after a survey conducted in the early summer, were not yet benefiting from the grant. The report was potentially an embarrassment for the government. However, it was the government itself which had requested Ofsted to look into the matter and it is probable, therefore, that the report will lead to changes in the ways the grant is used, and not used. It is relevant that the autumn 2012 Cabinet reshuffle gave David Laws, a Liberal Democrat, a high-profile responsibility for ensuring the premium's success.⁵

The pupil premium, explained Laws in an article shortly after the 2010 election,⁶ is designed to have two beneficial effects:

First, because the extra money follows the child, it will ensure that deprivation funding is far better targeted than it is now.

Second, the premium will deliver extra money to the schools with the highest level of challenge so giving them an opportunity to combat disadvantage.

Schools must not, he said, 'use the pupil premium to avoid making efficiency savings – they need to ensure that the pupil premium is used to do more for those who need the help most'. He added also, in language reminiscent of utterances from his Tory partners, that 'this government should not dictate to each school precisely how it should use the pupil premium – the coalition is moving away from Labour's obsession with micro-management. Schools will be held to account for their outcomes, and not for following some government mandated method.'

Either, Laws seemed to be suggesting, schools must be free to make their own decisions or else there must be micro-management from the centre, and methodology mandated by the government. He returned to this dichotomy on 29 October 2012 when he said in parliament, in answer to a question from Laura Sandys MP, that he could confirm 'we are not going back to the days under the previous government, who sought to micro-manage each piece of education expenditure'.

Setting up false dichotomies is a familiar rhetorical device. The effect of this particular false dichotomy – either complete freedom or meddling micro-management – was that necessary but painful and divisive conversations and deliberations were discouraged or prevented. Why do inequalities in modern society persist? Why, after nearly 150 years of compulsory education, are inequalities in wider society reflected and perpetuated by inequalities in educational outcomes? Is it not the case, as a recent review of research literature by the Royal Society of Arts has richly documented, that efforts over the decades to narrow or close the gaps in academic achievement between social classes have been largely unsuccessful?⁷ Is there the slightest evidence that all or most schools reliably know from their lived and recent experience how to improve the life chances of children from low-income backgrounds? Do any of the main political parties have, and have any of them ever had, evidence-based policies on this matter?⁸ In the absence of such questions being addressed, it is not surprising that the impact of the PPG is at present so uncertain, and that Ofsted found there are such diverse understandings of its purpose, and of how to deploy it effectively.

Laws did acknowledge and stress in his 2010 article that 'there should be clear advice and support available to schools so that best practice in using the premium can be spread'. He announced that 'schools which fail to use the premium to close the performance gap, or who use the money ineffectively, must be held to account'. Eventually the coalition government did decree that schools should publish information

online about how they use the pupil premium,⁹ and Ofsted announced that from September 2012 this would be subject to scrutiny.

So far, however, advice and support from the government and from Ofsted in relation to the grant have been sketchy and vague, for example 'encourage parents to stimulate and/or motivate their children to achieve their aspirations', and advisory documents issued by the DfE continue to use the depersonalising and demeaning term 'FSM pupils'.¹⁰ A preliminary reading for the purposes of this article at the information published in October 2012 on school websites about the PPG indicates that most schools still need to receive, and to give attention to, principled and evidence-based advice.

Equalities more generally

But with regard to equalities more generally, both Ofsted and the DfE have issued guidance documents which indicate, though do not state in so many words, that they consider that the intellectual and moral framework of the Equality Act 2010 is relevant to the operation of the PPG. In a document about the requirements of the Equality Act issued in 2010, for example, the DfE wrote as follows:

'It is unacceptable for educational attainment to be affected by gender, disability, race, social class, sexual orientation or any other factor unrelated to ability. Every child deserves a good education and every child should achieve high standards.

'We have one of the most stratified and segregated school systems in the world, with a gap between our private schools and the state system wider than in almost any other developed country. In 2006, England came near the bottom of a list of 57 countries for educational equality in an OECD report, and the gap is still vast. It is simply unacceptable that, in the most recent year for which we have data, just 40 of the 80,000 students eligible for free school meals went on to Oxford or Cambridge universities – fewer than certain private schools manage to send.

'On an ethical level this gap between the rich and the poor is indefensible. But reducing inequality is not only the guiding ethical imperative of our education policy; it is also an absolute necessity if we are to compete economically on the global stage. The truth is that many other countries in the world are improving their schools faster than we are. Many other countries have much smaller gaps between the achievements of rich and poor than we do. But most importantly, the very best-performing education systems show us that there need be no contradiction between a rigorous focus on high standards and a determination to narrow gaps between pupils from different backgrounds.

'Despite vast central government spending over the last thirteen years we are clearly, as a nation, still wasting talent on a scandalous scale. It is a moral failure and an affront to social justice. We must put this right, and it is a determination to do so that drives our vision for reform.'¹¹

The bringing together of the Equality Act and the narrowing of socio-economic gaps is a feature of the Ofsted framework that came into effect in September 2012. The explanatory notes issued to accompany the Education Bill 2011 stated that the framework would include 'consideration of how well a school provides for different groups of pupils' and indicated that such groups include not only those which are connected with disability, ethnicity and gender but also those which are connected with low household income, as reflected by eligibility for free school meals and the pupil premium. In a document issued in 2011 Ofsted introduced the new framework in these terms:

Persistent low attainment makes it harder for young people to get jobs or access further and higher education, and can have a deep and damaging impact on families and communities. It is therefore important that schools

reduce differences in attainment between groups in the school, including those between looked after children, pupils from different social and ethnic groups and between boys and girls. The new inspection framework will pay particular attention to such gaps in attainment and inspectors will look at what is being done to close them.

'Inspection is primarily about how individual pupils benefit from their school,' says Ofsted. It stresses, however, that 'it is important to test a school's response to individual needs by observing how well it helps all pupils to make progress and fulfil their potential, *especially those whose needs, dispositions, aptitudes or circumstances require particularly perceptive and expert teaching and/or additional support*' (emphasis added).

In any one school, such pupils may include pupils from certain cultural and ethnic backgrounds; pupils who belong to low-income households; pupils who are disabled; pupils who have special educational needs; boys in certain subjects; and girls in certain other subjects. The need to provide 'particularly perceptive and expert teaching and/or additional support' is underwritten by the Equality Act's emphasis on advancing equality of opportunity, described below as 'treating everyone differently'.

As all regular readers of this journal know well, the Equality Act is concerned with three broad aims. In legal language these are to do with eliminating discrimination, advancing equality of opportunity and fostering good relations. In more homely and everyday language they are to do with treating everyone the same (namely, eliminating discrimination), treating everyone differently (advancing equality of opportunity) and helping people get on with each other (fostering good relations). These three aims are not entirely separate from each other. On the contrary, they affect, reinforce and constrain each other. They can be pictured as a Venn diagram consisting of three overlapping circles, as shown in figure 1.

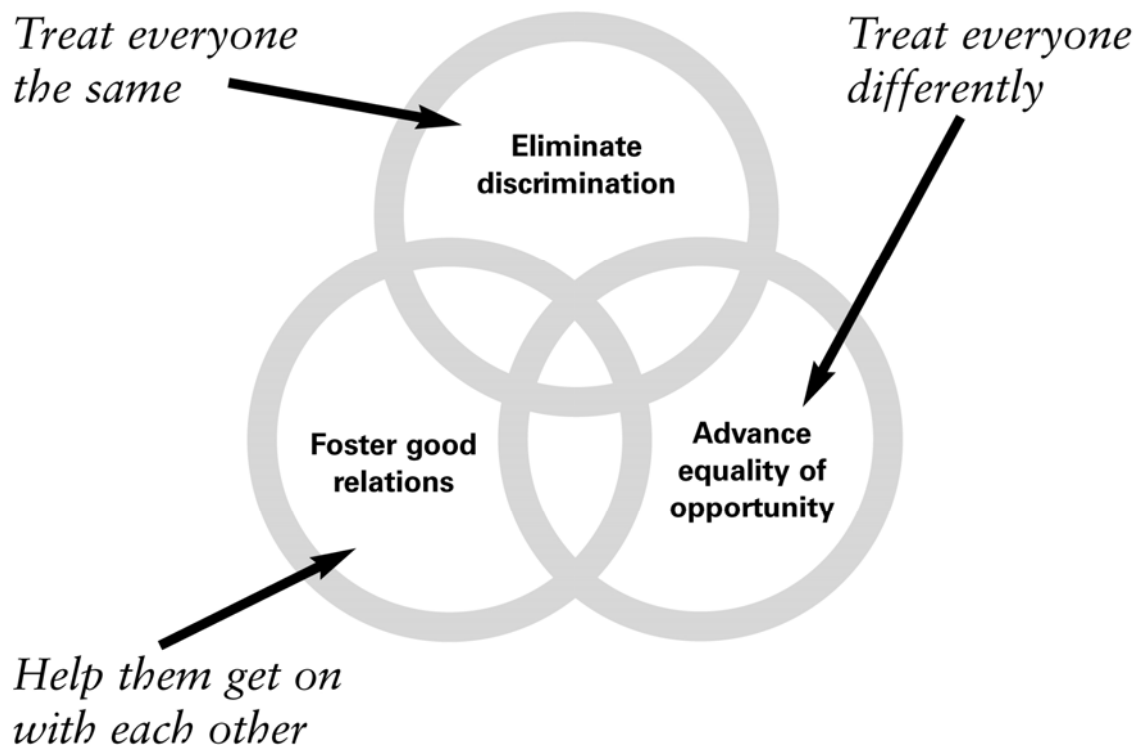


Figure 1: The three interacting and overlapping aims of equalities legislation

Seven topics for further consideration

Clearly, the three overarching aims of the general equality duty are as relevant to issues of poverty and social class as to the nine protected characteristics named in the Equality Act.¹² There are also several further points where there is convergence and synergy between the PPG and the Act. Seven of these are noted and briefly discussed below.

1. *Publication of information*

The Equality Act requires schools to publish information which demonstrates that they have due regard for the three aims of the Act, as summarised earlier in this article, and which in this way enables others to hold them to account. In a briefing document for inspectors published in February 2012 and re-issued in September 2012, Ofsted has listed some of the principal kinds of relevant evidence of due regard that should be looked for. The following statements are quoted verbatim from the Ofsted briefing:

- 'Before introducing important new policies or measures, the school carefully assesses their potential impact on equalities for its current and prospective students and parents, positive or negative, and keeps a record of the analysis and judgements which it makes. The data is available for public scrutiny.'
- 'Senior staff and governors know about the relative attainment and progress of different groups of students, and monitor their performance and other data relevant to improving outcomes.'
- 'The school tracks and analyses progression information, for example the proportions of students who continue education or training or enter employment, and identifies any barriers for particular groups.'
- 'The school's programme for continuing professional development (CPD) is inclusive of all staff and includes equalities matters, both directly and incidentally, and inspectors can identify clear evidence of impact at inspection.'
- 'There are clear procedures for dealing with prejudice-related bullying and incidents, and there is appropriate staff training that equips staff to identify and deal with this effectively.'
- 'There is coverage in the curriculum of equalities issues, particularly with regard to tackling prejudice and promoting community cohesion and understanding diversity.'

2. *Setting and publishing measurable objectives*

Schools and other public bodies are required by the Equality Act to publish and pursue specific and measurable objectives. The earlier quotations from a school website indicate that it is entirely possible to set measurable objectives in relation to pupils from low-income backgrounds. Impressionistic study of school websites in relation to the Equality Act, however, indicates that many schools are not yet able or willing to publish measurable objectives in relation to the Act's protected characteristics.¹³ There also

seems to be a reluctance to set objectives in relation to the PPG – the school cited earlier is an exception, not the rule. Synergy between the two sets of requirements – those of the Pupil Premium Grant and those of the Equality Act – would help promote understanding of the concept of measurable objective, and expertise in writing such objectives.

3. *Collecting and analysing reliable data*

The inspection regime in Wales, Estyn, has produced a self-evaluation checklist of data which a school needs in relation to pupils from low-income backgrounds. Some of its items are shown below. It is important and urgent that a list such as this should be adapted to refer also to the protected characteristics in the Equality Act. Also on several other topics relating to pupils from low-income backgrounds, incidentally, Estyn has produced helpful and authoritative guidance.¹⁴

- The school has clearly identified its disadvantaged pupils
- The school knows how well disadvantaged pupils are performing on key performance indicators
- The school knows the gap between the performance of disadvantaged pupils and others, and how this compares to national and local averages
- The school tracks the performance of disadvantaged pupils
- The school targets interventions based on the findings of the tracking system

4. *Intersectionality*

The academic term ‘intersectionality’ is apposite in the current context. Even though a complex mouthful, it valuably draws attention to the fact that no one is just one thing, but that on the contrary everyone lives at the intersection of several different characteristics. Children and young people who are eligible of the PPG, for example, are also boys or girls, all have an ethnicity, many have a faith background, many have special educational needs. These other characteristics must all be taken into account in the planning, monitoring and evaluation of how the PPG is used in practice. As mentioned above, the Equality Act requires not only that all pupils should be treated the same but also that all should be treated differently, in accordance with the aim of advancing equality of opportunity – as the well-known maxim puts it ‘one size doesn’t fit all’.

5. *Mix of universal and specific*

In order to narrow and close gaps in educational achievement, three kinds of measure are required: a) those which are the same for all pupils, regardless of background b) those which are the same for everyone but which need to be tweaked or adapted to engage members of a particular groups and c) those which are special, distinctive or additional for a particular group. Universal approaches include those which have been recommended by the Sutton Trust and the department for education – effective and regular feedback, metacognition, one-to-one tutorials, peer-to-peer support and pupil mentoring.¹⁵ For example, both universal and specific approaches are needed in relation to developing literacy skills amongst boys, or to support children and young people on the autism spectrum of disability, or to develop oracy skills amongst pupil for whom English is an additional language.

6. *Soft skills and extended literacy*

7.

Literacy is an essential skill, of course, particularly in relation to the kinds of academic language, or specific curriculum language, required for educational achievement. It is appropriate that the pupil premium grant should put much emphasis on enhancing literacy. But literacy is not just about the written word. It is also to do with oracy and discussion skills, obviously, and with film, television and radio. Further, it is not a value in itself, for it needs to be combined with 'soft skills', also known as people skills, character skills or emotional intelligence, and as spiritual, moral, social and cultural development (SMSC, which is being increasingly emphasised by Ofsted).

Such skills are said to be soft or fuzzy because they cannot be defined, let alone measured and assessed, with as much precision as can be applied to cognitive skills in, for example, mathematics and science. Key skills which all pupils need include curiosity, open-mindedness, willingness and ability to work in a team or group, helpfulness and consideration, persistence and staying on task, and emotional stability. There are several interesting examples of such activities in the appendix to the Ofsted report mentioned above.

8. *Difficult conversations*

The government maintains, as mentioned above, that each school knows best how to meet its own pupils' needs. It wishes to avoid, it says, micro-management from the centre. The fact remains that practical and positive ways of narrowing gaps in achievement are not universally self-evident and that consensus on causes and principles is not easily achieved. Difficult conversations have to take place about the difference between out-of-school and in-school factors (OSFs and ISFs), and about the tendency of schools to tacitly adopt deficit models relating to the causes of underachievement unless these are explicitly challenged.

For example, statements and remarks about children from low-income households such as the following need to be surfaced and discussed:

- 'Basically, teachers do not like these children and do not know how to relate to them'
- 'The parents did not themselves achieve success at school and their aversion to education and teachers affects their children'
- 'The parents have poor parenting skills – for example, do not set consistent boundaries, are inconsistent, do not show love and concern'
- 'The parents cannot afford to buy books, computers, foreign holidays, etc, that are helpful or essential for educational success'
- 'The issue is not mainly low income, but social class. The two are related, but are not the same'
- 'Government policies and Ofsted inspectors put too much emphasis on narrow definitions of what constitutes achievement'
- 'The economy needs, and has always needed, a certain proportion of the population to do unskilled work, or to be unemployed.'

Tensions

Although there are points of convergence and synergy between the pupil premium grant and the Equality Act, there are also significant differences between them. One of the most obvious differences is that the one (the PPG) has a great deal of finance attached, and that therefore there is a much more immediate need for accountability. Another difference is that the PPG has substantial commitment from the current government whereas the Equality Act in general, and perhaps the Equality Duty in particular, seems to receive no more than lukewarm support, if that.

On 19 November 2012, for example, the prime minister made a speech to the Confederation of British Industry (CBI)¹⁶ in which he said the government is going to abolish equality impact assessments (EQUIAs). This was misleading, since the decision to abolish equality impact assessments was formally taken on 8 April 2010, namely several weeks before Mr Cameron entered Downing Street two and a half years ago. That was the day the Equality Act 2010 received royal assent. EQUIAs ceased to be required from 6 April 2011, which was the day when the new public sector equality duty (PSED) established by the Equality Act came into effect. However much he dislikes what he calls red tape, a prime minister cannot abolish a requirement that does not exist.

The misleading announcement invited the suspicion that it is not so-called red tape that the prime minister dislikes but the Equality Act itself, and the principles and values which it enshrines. No doubt some of his political supporters are pleased to see and hear him making a coded attack on the Act,¹⁷ and no doubt there are civil servants (not least, alas, in the Department for Education) who are pleased to receive this signal that they need not always abide by the rule of law. Many people, however, including many civil servants, must be alarmed and sad.

Concluding note

A few days after the prime minister's speech mentioned above, the government equalities office published the terms of reference relating to a review of the public sector equality duty (PSED) stated in section 149 of the Equality Act.¹⁸ A report will be provided for ministers by April 2013 on:

- how the general and specific duties are working
- how effectively the duties support delivery of the UK government's Equality Strategy¹⁹
- options and recommendations for changes or improvements in the way the duties operate.

It is to be hoped that, following consideration of such matters, the government will re-affirm the importance of section 149 of the Equality Act and – amongst many other things – will encourage schools to integrate their responses to the Act with their responses to the pupil premium grant, wherever this would be relevant and appropriate. In the meanwhile, searching but supportive questions need to be put to the school cited at the start of this article, and to thousands of other schools as well.

Thanks are due to Bill Bolloten for comments and suggestions on an earlier version of this article.

References

¹ The headteacher's letter was published on the school's website and is therefore in the public domain. In order to avoid possible embarrassment or unfairness, however, the school is not named here.

² Pupil Premium 2011–12 school tables, Department for Education, 2012; <http://www.education.gov.uk/schools/adminandfinance/financialmanagement/schoolsreview/enuefunding/settlement2012pupilpremium/a0075963/pupil-premium-2011-12>.

³ As estimated by Ofsted in their report of September 2012

⁴ Relevant speeches by Nick Clegg referring to the pupil premium grant include are reported in 'Pupil premium will help future generations escape shadow of the deficit', *The Guardian*, 15 October 2010: <http://www.guardian.co.uk/politics/2010/oct/15/nick-clegg-pupil-premium-shadow-deficit> and an address at the New North Academy in Islington on 14 May 2012: <http://www.politics.co.uk/comment-analysis/2012/05/14/nick-clegg-pupil-premium-speech-in-full>

⁵ There is a list of Mr Laws's responsibilities at <https://www.education.gov.uk/aboutdfe/departamentalinformation/ministerialteam/laws>

⁶ 'Why I'm proud of the pupil premium' by David Laws, *The Guardian*, 24 October 2010 <http://www.guardian.co.uk/commentisfree/2010/oct/24/pupil-premium-promise-delivered>

⁷ *The Social Class Gap for Educational Achievement: a review of the literature* by Emma Perry and Becky Francis, London: Royal Society of Arts, 2010, http://www.thersa.org/_data/assets/pdf_file/0019/367003/RSA-Social-Justice-paper.pdf

⁸ For topical discussions of these matters see, for example, 'Rethinking poverty and social class: the teacher's response' by Terry Wrigley in Rowena Ahmed, Terry Wrigley and Lynne Pratt, eds, *Social Justice Re-examined: dilemmas and solutions for the classroom teacher*, Stoke on Trent: Trentham Books, 2012, and *Ignorant Jobs? – low attainers in a global knowledge economy* by Sally Tomlinson, London and New York: Routledge, 2013

⁹ See, example, the DfE page entitled 'The Pupil Premium – what you need to know', <http://www.education.gov.uk/schools/pupilsupport/premium/b0076063/pp>. The exact legal requirements are at <http://www.legislation.gov.uk/uksi/2012/1124/made>. Briefly, schools must publish on their website 'the amount of the school's allocation from the PPG in respect of the current academic year; details of how it is intended that the allocation will be spent; details of how the previous academic year's allocation was spent, and the effect of this expenditure on the educational attainment of those pupils at the school in respect of whom grant funding was allocated'.

¹⁰ 'Raising the attainment of pupils eligible for free school meals', <http://media.education.gov.uk/assets/files/pdf/p/provision%20map.pdf>

¹¹ Equality impact assessment of the reforms proposed in *The Importance of Teaching* White Paper, published on 24 November 2010.

¹² This point is made implicitly but powerfully in an article by Danny Dorling about a speech in December 2012 by Ed Miliband: 'Ed, English and Embarrassment', *Huffington Post*, 14 December 2012,

http://www.huffingtonpost.co.uk/danny-dorling/ed-english-and-embarrassment_b_2299207.html

¹³ 'The Public Sector Equality Duty 2010 – responses by the world of education, up to summer 2012' by Robin Richardson, *Race Equality Teaching*, volume 30 number 3, summer 2012.

¹⁴ For example, Estyn (2012) *Effective Practice in Tackling the Effects of Poverty and Disadvantage in Schools*,
<http://www.estyn.gov.uk/english/docViewer/259977.9/effective-practice-in-tackling-poverty-and-disadvantage-in-schools-november-2012/?navmap=30,163>,

¹⁵ The DfE recommendations on these topics are outlined at
<http://www.education.gov.uk/schools/pupilsupport/premium/how>

¹⁶ Fawcett Society: <http://fawcettsociety.org.uk/index.asp?PageID=1293>. Runnymede:
<http://www.runnymedetrust.org/blog/187/359/Cameron-declares-war-but-forgets-the-troops.html>

¹⁷ See for example the adulatory remarks about the prime minister's speech by a columnist at Conservative Home the following day:
<http://conservativehome.blogs.com/thecolumnists/2012/11/jill-kirby-equality-impact-assessments-ride-off-into-the-sunset-we-wont-miss-them.html>

¹⁸ <http://www.homeoffice.gov.uk/equalities/equality-act/equality-duty/equality-duty-review/terms-of-reference/>

¹⁹ <http://www.homeoffice.gov.uk/equalities/equality-strategy/>