

## Appendix XX

### EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Closure of primary provision on the Gwenneth Rickus site of Leopold Primary School
<b>DEPARTMENT:</b>	Children and Young People
<b>TEAM:</b>	Admissions and School Organisation Team, Forward Planning, Performance and Partnerships Service
<b>LEAD OFFICER:</b>	Michelle Gwyther
<b>DATE:</b>	5 January 2024

*NB: Please ensure you have read the accompanying EA guidance and instructions*

#### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Leopold Primary School is situated in the south of the borough. The Brent School Place Planning Strategy 2014-18 approved by Cabinet in October 2014, identified an increasing demand for primary school places and the need for additional places across the borough. To help meet this demand, new primary provision was established in 2014 under the management of Leopold Primary School on a separate site known as the Gwenneth Rickus Building. This was located on Brentfield Road 0.5 miles from the main site on Hawkshead Road. The provision was for 420 places in total with 60 in each year group from Reception to Year 6.

Many other schools in the area have also expanded on a permanent basis, thereby increasing the supply of places to meet anticipated demand at the time. Demand for places across London has, however, been decreasing since 2017. Borough-wide projections indicate that demand for Reception school places will continue to fall over the next 5 years. Planning Area 4 has the greatest number and percentage of spare places of all the six Primary Planning Areas in Brent. Schools in the area have been managing the impact of falling rolls for several years with the support of the Local Authority to manage the detrimental impacts of falling demand. A series of reorganisation strategies are currently being deployed including Pupil Admission Number (PAN) reductions, federations arrangements and a potential amalgamation.

The proposal to reduce capacity at Leopold Primary School is aimed at ensuring the long-term sustainability of all schools in the area.

The proposal is to close provision on the Leopold Primary School Gwenneth Rickus site by:

- Proposing a variation to reduce Leopold Primary School's Published Admission Number (PAN) from 120 to 60 from September 2025
- Closing the site for educational provision no later than the end of July 2027

Plans will be made for pupils currently educated on the site who will remain on the roll of Leopold Primary School beyond July 2027. Leopold Primary School will revert back to the status it had in 2013 as a single site primary school with a PAN of 60 and 420 places across Reception to Year 6.

2. Who may be affected by this policy or proposal?

Pupils  
 Parents and carers of children who attend Leopold Primary School  
 Residents in the Brentfield Road and Hawkshead Road areas i.e. Roundwood and Stonebridge wards  
 Staff/contractors based at the Gwenneth Rickus site and Hawkshead Road sites of Leopold Primary School  
 Leopold Primary School Governing Board

3. Is there relevance to equality and the council’s public sector equality duty? If your answer is no, you must provide an explanation.

Yes

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			x
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?		x

Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative equality impacts been identified with this policy or proposal?	x	
<p><b>If you have answered YES to ANY of the above, then proceed to section B.</b>  <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b></p>		

## SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The London Borough of Brent School Place Planning Strategy 2024 – 2028 (approved by Cabinet in October 2023) noted the sustained reduction in primary demand and the resulting level of spare places that are impacting on some schools. Planning Area 4 has the greatest number and percentage of spare places of all the six Primary Planning Areas in Brent. Primary Planning Area 4 covers the wards of Roundwood, Stonebridge and Harlesden and Kensal Green has very high levels of surplus places. The latest projections indicate a further reduction in demand in this planning area.

The closure of the Gwenneth Rickus site of Leopold Primary School has been proposed as part of a wider, co-ordinated series of measures which have included informal capping arrangements, Published Admission Number reductions and federations.

Leopold Primary School operates as one school with one leadership team and governing body across two sites. Leopold Primary School is situated on Hawkshead Road within the Roundwood ward. The Gwenneth Rickus site of Leopold Primary School is situated on Brentfield Road within the Stonebridge ward. The Leopold Gwenneth Rickus site was opened in September 2013 in response to increasing demand for primary school places in Brent. The site was previously used by the borough as a school improvement centre running courses for education professionals.

Currently children attending each of Leopold Primary School's two sites receive all of their education exclusively at that site. Each of Leopold Primary School's site can accommodate two forms of entry, but the Gwenneth Rickus site currently operates an informal cap of one form entry in Reception, Year One, Year Two and Year Four. The school achieves good outcomes for pupils across at or above national averages at all key stages and was rated by Ofsted as 'Good' in June 2022.

For the purposes of admissions when applying for a place at Leopold Primary School, parents can make a preference for either the Hawkshead Road site or the Gwenneth Rickus site on Brentfield Road.

The site has been selected for closure because it avoids the need to completely close a primary school. The location of the site is also such that there is sufficient capacity in the area to accommodate current and future demand for places. There are seven other Primary schools located within less than one mile than the Gwenneth Rickus site providing parental choice with the average travel distance of 0.52 miles. There are also seven schools located

within one mile of the Hawkshead Road site with 0.57 miles being the average distance to other schools.

Data on pupils at the school suggest that the intake is similar to other schools in terms of ethnic diversity, children on free school meals and children with special needs and disabilities. This indicates that attending other local schools would not have a negative impact on children that might otherwise attend provision on the Gwenneth Rickus site.

The proportion of children receiving benefits related Free School Meals at the school is 32.8% compared to 33.2% for the whole planning area. Ethnicity and SEND data is below

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

<b>AGE</b>	
<b>Details of impacts identified</b>	<p>If the Gwenneth Rickus site is closed it will affect 4 – 11 year olds who attend that site and who live in the local area as the option to attend provision on the site will no longer be available.</p> <p>The local authority is proposing a phased closure of the Gwenneth Rickus site. This would involve ceasing Reception intakes from September 2025 and moving any children who attend the site in September 2027 to the Hawkshead Road site to complete their education. This means that only children in Reception and Year 1 and Year 2 in academic year 2024/25 would need to move to the Hawkshead Road site when the site closes in summer 2027. The current Year 3 will complete their Year 6 in July 2027 and not be directly affected by the closure.</p> <p>The Local Authority recognises this may mean a longer journey for some children depending on where they live. It is also recognised that the closure proposal could have an impact on families who have children currently educated at the Leopold Primary School Gwenneth Rickus site and younger children who have not yet started school, as it would not be possible for them to attend the Leopold Primary School Gwenneth Rickus site from September 2025. Having children attending more than one school could be particularly difficult for large families.</p> <p>While it will not be encouraged by the local authority, parents would be able to choose to move their children to an alternative school. There are seven other Primary schools located within less than one mile than the Gwenneth Rickus site providing parental choice with the average travel distance of 0.52 miles. There are also seven schools located within one mile of the Hawkshead Road site with 0.57 miles being the average distance to other schools.</p>

<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p>The Gwenneth Rickus site has restricted accessibility. The site has two floors. The ground floor is fully accessible with wheelchair accessible toilets, but there is no lift to the first floor. If children with disabilities or with SEND attending the site are required to move site or school, the receiving site or school would be required to make any reasonable adjustments that may be necessary. Children with an Education, Health and Care Plan attending the site, would have their plans reviewed to identify the most suitable ongoing placement.</p> <p>The proportion of children at Leopold Primary School with an EHCP is 1.5% compared to 3.7% across the whole planning area. The proportion of children at Leopold Primary School receiving SEN Support is 9.2% compared to 18.1% across the whole planning area. (Data taken from the October 2023 School Census)</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>Pupils at the Leopold Primary School represent the diversity of Brent. Other schools in the primary planning area also have diverse intakes and it is not considered that attending an alternative site or school would have a negative impact on the basis of race.</p> <p>The top three ethnic groups attending Leopold Primary School match the top three ethnic groups across Primary Planning Area 4, although the proportion of each group is higher in Leopold Primary School. (Data taken from the ethnicity section of the January 2023 School Census)</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	N/A
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	N/A
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	N/A
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	Leopold Primary School is non-denominational. There are seven other schools in the local planning area which are non-denominational.
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	N/A

<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	N/A

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Informal consultation with stakeholders was carried out between 1 November 2023 and 13 December 2023. 174 responses were received, and approximately 100 members of the public attended consultation meetings, with separate meetings held for both staff and governors.

A formal statutory consultation will provide stakeholders an opportunity to comment on defined proposals.

5. Please detail any areas identified as requiring further data or detailed analysis.

N/A

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If following consultation a decision is taken to close the site, the proposals would be implemented from September 2025. This will allow time to plan in order to minimise the impacts on children, their families and carers. Any children remaining on roll at the site at the point of closure will have the opportunity to transfer to the Hawkshead Road site of the school or be supported to change to a different school.

If the proposal to close the site is taken forward, the implementation plan will consider how best to support children and families during the period of transition working with the leadership of the school. The current plan to phase the closure of the site aims to ensure that all children attending the site can complete their current Key Stage on the site to minimise disruption to families.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The proposals have already gone through informal consultation and responses reviewed. The final decision whether to close the Gwenneth Rickus site of Leopold Primary School will be made by Brent Cabinet after reviewing the responses to both the informal and formal consultations.

If the closure proposal proceeds, the Local Authority and the school would work together to manage implementation of the proposal in the least disruptive way.

## SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Based on current data analysis and information, officers are of the view that it is appropriate to proceed with formal consultation on the proposal to close the Gwenneth Rickus site of Leopold Primary School

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
Review concerns and issues raised during formal consultation	Inform the final proposal and if agreed, the implementation plan to be taken forward	Michael Rollin Michelle Gwyther	May 2024
Establish a clear implementation plan, working with the school leadership team and governing board	To mitigate negative impacts	Michael Rollin with support from other services	July 2024

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Michael Rollin
<b>REVIEWING OFFICER:</b>	Michelle Gwyther
<b>HEAD OF SERVICE:</b>	Michelle Gwyther