

# Impact Needs/Requirement Assessments Completion Form

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Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment or screening. Use this form for new and existing policies. Where a question is not applicable to your assessment, please indicate.

**1 What is the name of the service/policy/procedure/project etc to be assessed?**

“Strategy for the Development of Primary and Secondary Schools – Options for Delivering Additional School Places” – now revised by “School Places – follow-up Review of sites and Pupil Number forecasts”. (Report from Director of Children & Families 13<sup>th</sup> November 2006 and 15<sup>th</sup> January 2007 respectively).

**2 Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/policies etc in this area?**

In the secondary sector, the projected shortfall of school places is of the order of 15 Forms of Entry by 2016. In the Primary sector, the projections point to the need of an additional 7FE by 2016. This strategy is designed to ensure that the Council can meet its statutory duty to provide sufficient school places in accordance with Section 14 Education Act 1996.

The aim of the strategy is to expand provision of school places across the Local Authority area to meet the needs of young people and their families across the Borough.

The findings of a recent Demographics Review Group (December 2006) have been used to confirm the need for school places and the prime demand areas. Based on this information and the availability of sites either to expand existing provision or to site new school(s) the report sets out a recommended strategy for the development of school places that should form the basis of wider consultation with stakeholders and local communities. This strategy will contribute to the Council’s Corporate Strategy 2006-2010 particularly in respect of :

- Building our Capacity

A review of our property and asset portfolio is being carried out to ensure the sustainability of an asset management strategy to support the effective delivery of the additional school places.

- Early Excellence

The development of school places – of the right quality and accessible to every local area – will help raise the standard of education provision and the educational achievement of children and young people across the Borough, whilst addressing the specific needs of those who experience the greatest barriers to learning, thus ensuring the needs of specific groups are met.

The full strategy, once implemented will result in the expansion of high quality school places across the local area in Brent.

### **3 Are the aims consistent with the council's Comprehensive Equality Policy?**

Yes, the principal aim of this strategy is consistent with the aim of the Equality Policy to comply with all our legal requirements and adhere to our responsibilities for providing community leadership. It is also consistent with Children and Families Department's Equality Action Plan. The strategy sets out to meet the needs of the Borough's diverse (in respect of ethnic groups, gender balance and children with specific access needs) community. In particular the strategy, among other objectives, aims :

- To promote equality of opportunity, good relations between people of different races and groups and perpetuate a sense of community cohesion
- To help celebrate and value the differences between us (in both the council and the community) and communicate our pride in our diversity
- To help eliminate all forms of discrimination and harassment under the control and influence of Brent council.

We want to ensure that children and young people are given opportunities to access school places – particularly including vulnerable groups traditionally disadvantaged by the lack of availability of good quality school places locally.

Where an Academy is proposed, the Secretary of State will approve admissions arrangements (among other arrangements within a Funding Agreement to be signed by the Secretary of State, the Academy trust and the Local Authority) which will conform to a national and legally enforceable “ Code of Practice on Admissions” – which itself requires criteria to be non-discriminatory in respect of race, disability and gender – and will give due regard of outcomes of consultation with the Admissions Forum and the Local Authority.

**4 Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/age/health etc? What are the reasons for this adverse impact?**

Brent is one of the most culturally diverse areas in the country and one of only two boroughs where black and minority ethnic groups are in the majority. The borough is also home to many refugees, asylum seekers and economic migrants. Generally the population is increasing and new housing in regeneration areas will bring more children. Of 11,000 planned new dwellings, there are 5,500 planned in the Wembley area. Nearly 15% of our population lives in one of the most disadvantaged wards in the country and over a third of our children live in low income households in receipt of council tax benefit. This strategy is a borough wide strategy for addressing shortage of school places. As far as secondary school places are concerned, we aim to expand provision by 9FE in the North of the Borough and 6FE South of the North Circular Road. This spread of additional provision reflects both the availability of sites and the primary source of pressure of school places. It is not expected therefore that this strategy will have an adverse impact on young people.

Local solutions are provided in this strategy by the proposed expansion as described above including 6FE via the new proposed second Academy. The Academy, in consultation with the Authority, will be responsible for its own admission criteria which will be set within the statutory Code of Practice on admissions. The development of new school places in the North of the Borough, in advance of expansion in other parts of the Borough, should not preclude students from those parts who choose to access those places from doing so. 72% of all on time applications for secondary transfer last year were offered their first preference. Of that 72%, 52% who were successful in obtaining their first preference were from the North of the Borough whilst 48% were from the South of the Borough. DfES guidance provides that a suitable radius for a secondary school pupil to travel from home to school is 3 miles (Basic Needs assessments); whilst the proposed second Academy is aimed at making provision available to local people, children from a wider area who meet the admission criteria will be able to access the secondary school places.

The ethnicity of the existing schools proposed for expansion is as follows:

School Name	Asian %	Black %	Chinese %	Mixed %	White %	Other %
Capital City Academy	15.58	45.41	0.00	6.60	21.78	10.11
Copland Community School & Tech. Centre	39.44	44.01	0.00	2.89	8.72	4.62
John Kelly Boys' Technology College	31.96	34.90	0.00	3.09	13.25	16.35
John Kelly Girls' Technology College	34.66	34.98	0.00	3.55	11.84	14.85
Preston Manor High School	51.40	22.79	0.00	5.75	11.21	8.26
Queen's Park Community School	25.53	24.14	0.00	14.04	29.06	6.73
Wembley High School	34.20	36.63	0.00	7.20	10.89	10.80

The schools proposed for expansion have a diverse ethnic representation of children. The table also shows a significant group of both Asian and Black (African and Caribbean) children on roll and both of these groups would benefit from local school expansions.

We have examined the number of applicants for secondary school places in 2006/07 to see if any ethnic group is underrepresented in gaining their first preference of school. The following table shows the ethnicity of applicants in 2006 that were successful in obtaining their first preference of secondary school compared with the ethnicity of the school population as a whole. It shows that there is not a significant disparity in gaining a first preference according to ethnicity.

Ethnic Group	Ethnicity of successful first preference applicants	The Brent School Population
	%	%
Asian	28.0	31.6
Black	26.6	28.9
Mixed	6.3	6.3
White	19.9	20.9
Other	5.4	6.9
Unknown	13.7	5.4

The development and implementation of the strategy is closely linked to the availability of sites and capital resources. Land of a sufficient size for a new 6FE secondary school with a co-located 2FE primary school is available in the Wembley area. The resources for this initiative are available from the Academy's funding stream. The net result is that a new school could be available from September 2010 in the Wembley Park area only and not elsewhere by that date. In the interim, the Council will seek to secure resources under the Primary Capital Programme (PCP – a government initiative aimed at rebuilding, renewing or improving primary school buildings with funding available from 2008/09 onwards) in 2008/09 and Building Schools for the Future (BSF – a government initiative aimed at rebuilding, renewing or improving secondary school buildings. Brent is due to benefit from this initiative in Investment Waves 7-9, with effect from 2011 onwards). In the interim, the Council has agreed to set aside resources to plan for the delivery of new (primary and secondary) school places once the funding is available.

Therefore it is expected that there will be a short time lag between a new build school in Wembley in September 2010 (subject to the decisions of the Executive in January 2007) and the expansion of provision of other schools across all parts of the Borough between 2008/09 and 2011/12. We have therefore carefully considered the arguments that the new proposed Academy in September 2010 will favour children in the north of the Borough whilst (conversely) disadvantaging children in the south of the Borough. We feel that the increase in the supply of secondary school places with effect from September 2010 will have a beneficial effect across the Borough as choice

and diversity of provision is increased. There is no evidence that the new school will disadvantage any section of the local community. Young people (including those from the traditionally disadvantaged groups described above) unable to get a local school have to travel to out-borough schools. This proposed Academy (for September 2010) and other school expansions will help address those deficits.

We have also considered the need for single sex and faith schools. The Strategy incorporates the expansion of two single sex schools in the Borough the majority of whose children are from black and minority groups; one of these two schools is popular among sections of the local Muslim community – we therefore feel also that the needs of this specific religious group can be addressed through the proposed strategy. At the primary age range we are expanding one of the Muslim faith primary schools. Demand for CofE denominational places is currently being met by out-of-Borough schools. Discussions with the Roman Catholic Archdiocese confirm the need for the retention of RC school places. Prior to the establishment of this strategy and in recognition of the diversity of the Borough, the Council supported the establishment of a further secondary Jewish VA school and an all through Hindu school. The promoters of the Jewish school withdrew their applications and the proposal for the Hindu school was not approved by the DfES.

The proposed new Academy is co-educational and non-denominational and will provide opportunities for children of all backgrounds.

We have also reviewed access to the school places likely to be generated by the Strategy. The Strategy, as it is implemented, will incorporate the outcomes of the SEN Review (2005). The provisions of the Code of Practice on Admissions will give due priority to those in Local Authority Care and those with a statement of special needs before criteria based on siblings and proximity. Therefore, the admissions criteria for all schools involved in the Strategy for the Development of School Places, will provide for equity in access to school places. As an Academy is not legally required to prioritise children with a statement of Special Educational Needs, there is a potential adverse impact on equity of access, in respect of an Academy being named for a child on a statement of Special Educational Needs. However, the proposed sponsor is committed to working with the Local Authority to support the achievements of vulnerable and disadvantaged children.

- 5 Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make your judgement separately (by race, gender and disability etc).**

Ward profiles based on 2001 census from Intranet Borough Overview

January 2006 School Census data – school profile

Demographics Review Report December 2006

Unplaced Pupil Data (under constant review)

SEN Review (2005)

**6 Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of Disability Discrimination Act and the regulations on sexual orientation and faith if applicable)**

The proposed Strategy meets the needs of local people across the Borough.

The following unmet needs are being addressed through the Council's Capital Programme.

1. Schools Access Initiative to improve access to the curriculum by groups of children with either physical or sensory impairment;
2. Extended school programme aimed at addressing the need of vulnerable communities in the most deprived wards in Brent;
3. The condition of buildings rated to be in very poor condition but remaining as high priority for repairs is being progressively addressed through the Council's four year Capital Programme.

**7 Have you consulted externally as part of your assessment? Who have you consulted? What methods did you use? And what have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?**

During 2005 and 2006 schools and neighbouring Local Authorities were consulted on the outcomes of the review of pupil places both across the primary and secondary school sectors. There was no adverse reaction to those documents. There was wide consultation over the SEN Review during 2005 – including schools, neighbouring Authorities, partner agencies and parents. Extensive consultation, including sets of parents and other stakeholders, has taken place over the expansion of Wembley Primary School, the expansion of John Kelly Girls' School, the expansion of John Kelly Boys' School, the expansion of Preston Manor School and the expansion of Islamia Primary School.

External consultation, on the proposed Strategy (agreed by Executive in November 2006), has not yet taken place either on this overall strategy or on specific proposals contained within it. The Executive is asked to agree to

begin consultation with the Schools Forum and the wider schools community on the principles of, and a phased programme for, the further development of both primary and secondary schools (both community and foundation), for providing sufficient school places. The consultation strategy will be reviewed by a Member level strategy board.

The Demographics Review report and feedback from Headteachers and their constituency groups confirm the need to expand school places.

**8 Have you published the results of that consultation, if so, where?**

The Demographics Review report is on the Council's Intranet.

**9 Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?**

The Teacher Trade Unions have expressed their view that the siting of an Academy in Wembley rather than in the south of the Borough could be indirect discrimination against Black students who according to the Unions live predominantly in the south of the Borough; the siting in Wembley they claim would favour Asian students who live predominately in the north. The argument is that students in the south of the borough have less easy access to secondary schools than in the north and that the key regeneration areas where investment is needed are in the south of the borough.

It is not considered that any allegation of discrimination is valid on the following grounds;

- The Wembley site which is near the new major housing development (over 50% of the total of new housing in the borough) is central to the borough with good transport links to the south. National criteria for the establishment of a secondary school provide for a reasonable access area of a radius of 3 miles which takes in the vast majority of the south of the borough including Stonebridge and Harlesden which have the highest proportion of Black residents – (43-45%).
- The School Places Strategy provides for expansion of school places in both the north and south of the Borough. Currently there is no site available in the south of the Borough to meet the immediate need for expansion of school places.
- The Wembley area is ethnically diverse with a substantial proportion of Black residents (20%).

**10 If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think whether the proposed service/policy etc will have a positive or negative effect on the**

**promotion of equality opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.**

In our judgement, there will be no adverse impact stemming from the proposed Strategy. Overall the Strategy will improve choice and diversity. The impact on Equalities will be kept under review and reported to the member level Strategy board on a regular basis together with proposals for the implementation of specific proposals within the Strategy.

The development of a new Academy in Wembley, as an element of the wider strategy for the development of school places, will increase diversity and choice. While the new Academy will come on stream from 2010, other expansions will follow soon thereafter. Overall this strategy will have a positive impact on the young people, their families and communities of Brent.

**11 If the impact cannot be justified, how do you intend to deal with it?**

N/A

**12 What can be done to improve access to/take up of services?**

The selection of a site with good transport links ensures that those who live further away from the Academy are able to travel easily to it. Where relevant we will negotiate with TfL for the improvement of bus routes to match the increase in school places.

Effective consultation, leading to the provision of a good quality school place for every local child, based on sound and regularly reviewed pupil forecasts will further strengthen our ability to provide improved access to all. The selection of a site for a proposed new school in an area of greatest demand for school places and where there are plans for substantial additional housing development within the Borough will further enhance access to and the take up of school places by the Borough's young people.

**13 What is the justification for taking these measures?**

Good quality school places for all in every local area provide an opportunity for life chances to be enhanced.

This Strategy will widen the availability of high quality school places – see above – Children and Young People's Plan, Every Child Matters, Children's Act and Education Act 1996.

The Council's corporate strategic aims – Community Access, Early Excellence, Building our Capacity - have also been among the central drivers of the Strategy approved by the November 2006 Executive.

**14 Kindly provide us with separate evidence of how you intend to monitor in future**



The Member level Schools Development Strategy Board will receive regular reports and meet twice a year to monitor progress towards implementation of the strategy.

**15 What are your recommendations based on the conclusions and comments of this assessment?**

**Should you:**

- Take any immediate action?

Yes – we believe the set of proposals making up the Strategy should be implemented with an immediate decision required on the siting of the proposed second Academy as proposed in the November 2006 Executive report.

- Develop equality objectives and targets based on the conclusions
- Carry out further research

The equality objectives will be monitored on an on-going basis as set out above.

**16 If equality objectives and targets need to be developed, please list them here.**

**What will your resource allocation for action comprise of?**

Resources will be met from (i) Existing capital resources  
(ii) Academy funding stream  
(iii) Securing of resources from PCP and BSF programmes

**If you need more space for any answers please continue on a separate sheet.**

**Signed by the manager undertaking the assessment**

**Nitin Parshotam**

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**Full name (in capitals please)**

**NITIN PARSHOTAM**

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**Dated 5<sup>th</sup> January 2007**

**Service Area and position in the council**

**Head of Asset Management  
Children and Families**

**Others involved in the assessment - auditing**

**team/peer review**

**When you have completed this form, please take a copy and send it to the Corporate Diversity Team, Brent Town Hall, Forty Lane, Wembley, Middx HA9 9HD.**