

Appendix 2:

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Expansion of Phoenix Arch Special School by 50 places on Strathcona site
DEPARTMENT:	Children, Young People and Community Development
TEAM:	Inclusion Service
LEAD OFFICER:	Roxanna Glennon, Head of Inclusion
DATE:	1 June 2026

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

In January 2026, Brent Cabinet received a report setting out plans to provide more special school places to meet as a second phase of the Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND, following successful delivery of 382 additional places. The report set out a business case for a programme of five special school expansion projects that would deliver 212 places, including use of the Strathcona site as a local special school satellite (50 place) subject to consultation in response to increasing unmet demand for local special school places.

The proposal is to expand Phoenix Arch Special School by 50 additional places for children and young people with SEND (primarily autistic spectrum condition) on the Strathcona site follows detailed discussions with the school leadership and Governing Board. The expansion of the school is a response to increasing demand for special school places across the borough for children who present with autistic spectrum condition (ASC), which is the school's designated cohort.

Brent currently has a shortfall of around 210 places in primary special schools. This proposal will go some way to addressing this need and will enable more Brent children to attend a local special school, avoiding either placement in the independent sector, out-of-borough special schools or the mainstream school sector. It will support children attending the school to feel part of their local community and will avoid the need longer travel distances to school.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

- Primary aged children with SEND (Phoenix Arch is a primary special school and therefore the provision will be for primary aged children only with SEND (autistic spectrum condition and associated learning difficulties).
- Parents and Carers of primary aged children with SEND

3. If no groups are affected, explain why.

n/a

4. Mark with an "X" the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.	x		
Care Experience - People who have been in care for any period of their childhood.		x	
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.	x		
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		x	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		x	

Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.		x	
Religion or belief - People of all faiths, and those with no religious belief.		x	
Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.		x	
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.		x	
Other relevant groups* <i>[replace this text and specify where appropriate]</i>		X	

* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

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

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?	x	
Does it relate to an area with known inequalities?	x	
Would it add, change, or remove services used by any groups listed in Q4?	x	

Does it have negative or positive equality impacts on any groups listed in Q4?	x	
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

As set out in the School Place Planning Strategy 2024-28 Refresh approved by Cabinet in November 2025 and the Phase 2 SEND Capital Programme paper agreed by Cabinet in January 2025, Brent has a shortfall of special school places. This relates to a continued increase in children and young people with SEND requiring an Education, Health and Care Plan (EHCPs). The number of children and young people with an EHCP was 3,892 as at March 2025 and 4,306 as at March 2026, an increase of 10.6%.

As a result of the shortfall of places, many primary aged children with ASC are having to travel to schools out of Brent (special schools in other boroughs or schools in the independent sector), which does not support children to be part of their local community. Some children who would attend the new provision are receiving home tuition or remaining in mainstream settings whereas their needs would be better met in special school provision. The expansion of Phoenix Arch by 50 places will support more of the Brent primary cohort of children with ASC to be in local special school provision.

Phoenix Arch is a good school and the expansion will ensure that more local children benefit from the quality of education that the school provides. The proposal has the support of the Phoenix Arch Governing Board.

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.
 - Provide data and evidence to explain how you reached your conclusion in the right-hand box.

Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This provision will positively support primary aged children with SEND as outlined above. Children will be allocated a place according to their needs as identified in their EHCP in consultation with parents, as is usual process.	The proposal will provide an additional 50 local primary special school places.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal has no impact on this group.	

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This provision will positively support primary aged children with SEND as outlined above.	The proposal will provide an additional 50 local primary special school places.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal has no impact on the basis of gender.	

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on children and therefore has no impact on the basis of marriage and civil partnership.	

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and therefore has no impact on the basis of pregnancy and maternity.	

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and therefore has no impact on the basis of race and ethnicity.	

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of religion or belief.	

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of sex.	

Sexual Orientation

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of sexual orientation.	

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The proposal impacts on primary aged children with SEND and has no impact on the basis of socio-economic status.	

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There are no other relevant groups impacted by this proposal.	

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

The Phase 2 SEND Capital Programme was developed with input from local special schools and Brent Parent Carer Forum.

On the specific proposal, informal engagement with parents and carers of children currently attending Phoenix Arch Special School, governors of the school and residents who are local to the Strathcona site informed the proposal that was subject to formal consultation. The proposal has overall support. However, in both the informal and formal consultation, local residents raised concern about potential increases in traffic / parking issues related to the proposal. As the design and implementation plan are developed further, mitigating measures will be refined.

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

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SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G.**
- If you decide not to move forward, explain why, and **do not complete sections E or G.**
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

There are positive impacts from this proposal for children and young people with SEND in providing further local special school places. The intention therefore is to proceed with the proposal, subject to Cabinet approval.

SECTION D - RESULT

Select one of the following options with an "X".		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE/ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.

- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Formal Statutory consultation (subject to Cabinet agreement)	Publish a statutory notice and undertake 4 weeks of statutory consultation	Roxanna Glennon	By end July 2026	Completed
Review feedback raised during formal consultation and report back to Cabinet	Inform the final proposal and implementation, subject to Cabinet agreement	Roxanna Glennon	By October 2026	Completed
Establish an implementation plan with Phoenix Arch leadership and Governing Board	To ensure smooth delivery and to mitigate any concerns	Roxanna Glennon / Phoenix Arch School	October 2026 onwards	To be progressed subject to Cabinet agreement to the proposal

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

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SECTION F – SIGN OFF

	Signature	Date
Officer:	Roxanna Glennon	28 July 2026

Reviewing Officer or Head of Service	Shirley Parks	30 July 2026
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SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	

<u>Date of 3rd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	