

Cabinet

Date: **23 January 2025**

Time: **4.30pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Burden, Daniel, Miller, Muten, Pumm, Robins, Rowkins and Williams

Contact: **John Peel**
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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 15 January 2025

AGENDA

Part One

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124 PROCEDURAL BUSINESS

- (a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- (b) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and online in the Constitution at Part 3E

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To receive any petitions presented by members of the public.
- (b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on the 17 January 2025
- (c) **Deputations:**
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To consider any written questions

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Contact Officer: Stephen Marsden
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Contact Officer: Andrew Westwood *Tel: 01273 292468*
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Contact Officer: Nigel Manvell *Tel: 01273 293104*
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Contact Officer: Miles Davidson Tel: 01273 293150
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Contact Officer: Max Woodford Tel: 01273 291666
Ward Affected: All Wards

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Contact Officer: Laura Wells Tel: 01273 291028
Ward Affected: All Wards

145 BRIGHTON I360 - DECISION ON FUTURE (EXEMPT CATEGORY 3) To Follow

Contact Officer: Max Woodford Tel: 01273 291666
Ward Affected: All Wards

146 PART TWO PROCEEDINGS

To consider whether the items listed in Part Two of the agenda and decisions thereon should remain exempt from disclosure to the press and public.

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Further information

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email john.peel@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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Brighton & Hove City Council

Cabinet

Agenda Item 128(a)

Subject: Petitions

Date of meeting: 23 January 2025

Report of: Director- Governance & Law

Contact Officer: Name: John Peel
Tel: 01273 291058
Email: john.peel@brighton-hove.gov.uk

Ward(s) affected: All

1. Purpose of the report and policy context

- 1.1 To receive any petitions submitted directly to Democratic Services or any e-Petition submitted via the council's website.

2. Recommendations

- 2.1 That Cabinet note the petition.

3. Context and background information

- 3.1 To receive the following petition signed by 109 people at the time of publication:

(1) Lack Install Adequate Lighting in Tarner Park-

We the undersigned petition Brighton & Hove Council to Repair and / or replace the floodlights on the sports court within Tarner Park as well as the general lighting (lampposts) throughout the park. For the past 2 years, we have been asking the Premises team at Brighton & Hove Council to fix and / or replace the floodlights on the sports court. 3 are broken completely, and the one that works is facing the wrong way. In addition to this, we have been asking City Parks and the Street Lighting team to fix and / or replace the general lighting throughout the park. There are 11 lampposts, of which 3 are working.

The existing lighting is extremely temperamental, due to the power box not being water tight. The early sunsets mean the park is extremely unsafe for our attendees and the general public using the park. Tarner has worked hard, with support from the Police, to manage Tarner Park and keep it as a safe space for all. However, with a lack of lighting we believe the park will attract extremely dangerous activities such as drug use and knife crime, as previously evidenced. We believe there will be a serious incident due to the lack of lighting.

We run After School Clubs, Youth Clubs and Holiday Playscheme sessions 51 weeks of the year, working with up to 100 Children and Young People per day. We have begged the Council to help us keep our service users safe, but to date no action has been taken. The Tarner area is one of the

most deprived neighbourhoods in the country, and we are being let down by Brighton & Hove City Council.

Brighton & Hove City Council

Cabinet

Agenda Item 132

Subject: Brighton and Hove Food Strategy Action Plan 2025-30

Date of meeting: 23 January 2025

Report of: Cabinet Member for Communities, Equalities and Human Rights

Contact Officer: Name: Angela Blair
Email: Angela.Blair@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 This report is to seek endorsement from Cabinet for the refreshed Brighton and Hove Food Strategy Action Plan 2025-30, which aligns with core outcomes of the Council Plan 2023-27.
- 1.2 Delivery of the action plan will strengthen our poverty reduction approach contributing to 'A fair and inclusive city'. Cooking, food growing, and food waste prevention activities improve the city's social infrastructure creating 'A city to be proud of' and increasing opportunities for healthier and more sustainable food choices helps us be 'A healthy city where people thrive'.
- 1.3 Local and national research shows that while citizens have deep rooted concerns about the food system, they are inherently solutions-focused in their thinking, supporting a wide range of government proposals for action.

2. Recommendations

- 2.1 That Cabinet agrees to endorse the city's Food Strategy Action Plan 2025-30 (Appendix 1) and to be one of the partners involved in delivery and evaluation.

3. Context and background information

- 3.1 There is a direct link between food systems and major health issues, such as type 2 diabetes and heart disease. Costs associated with the rising burden of preventable chronic disease include healthcare costs, social care costs, welfare, productivity losses and human costs. Food systems also impact biodiversity, water resources, pollution, soil health, deforestation, climate change and provide critical infrastructure across local areas and regions.
- 3.2 The Marmot Review into health inequalities in England was published in 2010. It proposed an evidence-based strategy to address the social

determinants of health, the conditions in which people are born, grow, live, work and age and which can lead to health inequalities. One of the six policy objectives was to 'Create and develop healthy and sustainable places and communities' and includes a specific recommendation on 'Improving the food environment in local areas across the social gradient'. Over a decade and a half later we continue this long-term commitment to tackle inequalities.

- 3.3 The Food Strategy Action Plan outlines how collectively as a city we can achieve a healthy, sustainable and fair food system for Brighton & Hove, from production and distribution to consumption and waste management.
- 3.4 By endorsing this Food Strategy Action Plan, the Council is showing its own commitment, providing leadership and acknowledging the shared effort by partners from across the statutory, businesses and community sector. This ensures there is a local delivery system to deliver national food strategy and participatory decision making at a local level.
- 3.5 In the five years since the last Food Strategy Action Plan (2018-2023), there have been both positive and negative changes to note. The city was the first to be awarded Gold Sustainable Food Places status and partners have been successful in attracting millions of pounds of funding for food system transformation e.g. DEFRA, Big Lottery, Esmée Fairbairn Foundation and UK Research and Innovation (UKRI). At the same time, Covid and the cost-of-living crisis have impacted our food security. The cross-sector relationships that the food strategy approach enabled to develop in the city were a key factor in the city's ability to form a quick and effective food response during the pandemic.
- 3.6 The refresh of the Food Strategy Action Plan involved setting the actions within the context of the current policy environment and meeting with stakeholders to agree a new action plan. These actions help support the delivery of outcomes in the Council's Corporate Plan A city to be proud of; A fair and inclusive city; A healthy city where people thrive. The Action Plan delivery aligns with specific goals in the Council Plan as shown in Table 1.

Table 1. Food Strategy Action Plan 2025-30 delivery aligned with the Council Plan

Outcome 1: A city to be proud of	
Investing in our city	Alignment with Food Strategy Action Plan
<p>Grow a diverse and sustainable city economy</p> <p>The 8 aims in the Food Strategy Action Plan set out how collectively as a city we will achieve a vision of a healthy, sustainable and fair food system for Brighton and Hove.</p>	<ul style="list-style-type: none"> • Creating a sustainable and healthy food environment • Ensuring major developments provide space for food growing • Minimising food waste • Support regenerative farming • Providing an affordable and sustainable local food supply
Outcome 2: A fair and inclusive city	
An inclusive and fairer city	Alignment with Food Strategy Action Plan
Work to reduce inequality	<ul style="list-style-type: none"> • Tackling food poverty and food security for all

The Food Strategy Action Plan is aligned to the Cost-of-Living Action Plan, Anti-Racism Strategy and the Third Sector Investment Fund activities.	<ul style="list-style-type: none"> Investing in advice and financial inclusion via CVS food network Including emergency food needs of Black and Racially Minoritised communities, refugees and asylum seeker communities
Outcome 3: A healthy city where people thrive	
Living and ageing well	Alignment with Food Strategy Action Plan
<p>Enable people to live healthy, happy, and fulfilling lives</p> <p>The Action Plan adopts a whole-city approach to food and wellbeing, prioritising those with the poorest diets or least access to healthy food, with a focus on prevention.</p>	<ul style="list-style-type: none"> Developing our prevention and family support work Helping people to be physically active and maintain a healthy weight Being an age and dementia friendly city Information, advice and guidance on staying healthy

- 3.7 In addition to the Council Plan, where ‘Tackling food poverty and food security for all’ is referred to, the Food Strategy Action Plan complements and aligns with several other key council strategies and policy documents.
- 3.8 Food actions are now embedded into major local policy documents, including the City Plan, the City Downland Estate Plan, the Brighton and Hove Joint Health and Wellbeing Strategy, the Brighton and Hove Economic Plan, the Cost-of-Living Action Plan and anti-poverty approach, the Anti-Racism Strategy and the Circular Economy Route Map and Action Plan.
- 3.9 The Action Plan’s development has been informed by consultations, data and evidence and an Equalities Impact Assessment (EIA) has been prepared to accompany the Action Plan (Appendix 2). Implementing the Equality Diversity and Inclusion actions will improve the approach to monitoring actions and increase understanding and analysis of local data.

Plan Development

- 3.10 Brighton & Hove Food Partnership (BHFP) was started by residents in 2003. BHFP supports communities, helping people learn to cook, eat a healthy diet, grow their own food and waste less food. They focus on policy and support partnership work as a respected and trusted organisation and as recognised leaders in national and international food networks. The council’s relationship with BHFP is strong and there is commitment to work together.
- 3.11 The process of refreshing the city’s Food Strategy Action Plan is overseen by the Food Strategy Expert Panel – a group of experts represented by business, academia, local government, NHS, and the voluntary and community sector. See Table 2 below for list of those consulted.

Table 2. Consultation with members of the public, experts and organisations

City-Wide Events	<p>Brighton and Hove Food Partnership (BHFP) & Free University Brighton’s course ‘From Farm to Fork’, Jan-Mar 2024.</p> <p>Climate Change: BH public event ‘How to reduce climate impact’, 29 Feb 2024.</p> <p>Beyond Food Banks, 24 Apr 2024.</p> <p>Secondary school consultation on meals, 19 Jun 2024.</p>
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	FoodSEqual Survey, 29 Jun 2024. Good Food Procurement Group, 17 Jul 2024. BHFP AGM, 1 Oct 2024.
Experts and Organisations	BHCC Public Health team, Healthy Weight Programme Board, Food Policy Coordinator, Senior Planning Officer, NHS Sussex Integrated Care Board. Surplus Food Network, Emergency Food Network, Holiday Activity and Food Programme. Restaurants Brighton, B & H Economic Plan Stakeholder Consultation. Good Food Procurement Group members, Fork & Dig It CSA, The Compost Club. Brighton & Sussex University Food Network (BSUFN), Brighton and Hove Allotment Federation (BHAF), Brighton and Hove Organic Gardening Group (BHOGG), Allotments Manager, Cityclean. Food Matters, Community Works, Trust for Developing Communities, Brighton and Hove Energy Services Cooperative (BHESCo). Brighton Met College Hospitality & Catering Lead, The Living Coast UNESCO Biosphere.

- 3.12 The Food Strategy Expert Panel agreed the priority areas, timeline and approach. The plan's actions were reviewed and updated to get a clearer understanding of progress to be able to focus efforts and resources. To date, around 61% of the actions from the 2018-2023 Food Strategy Action Plan have been completed. Some of these actions are ongoing and a few have been achieved but have since slipped back (in part due to the impact of the pandemic).
- 3.13 To ensure the Food Strategy Action Plan 2025-30 was led by the latest research and evidence, academics from local universities (through the Brighton and Sussex Universities Food Network) were brought together. They presented their research findings and discussed what they would stop, start and continue under the action plan's 8 strategic aims.
- 3.14 The themes that arose included reforming food banks to enhance equitable access and reduce stigma, creating more community growing possibilities, and scaling up impact through procurement and change through anchor institutions e.g. hospitals, schools, universities. Suggestions were made to hold regular research-policy discussions on more specific targets (e.g. food waste, healthy food in schools) on an ongoing basis.
- 3.15 The action plan was also informed by recent research from the Institute of Development Studies (Building Back Better from Below); UKRI's Food Systems Equality national research project; and Horizon EU's Cultivate Programme.
- 3.16 Community input / engagement was via focus groups including insight from people with disabilities and long-term health conditions requiring food support; with people from Black and Minoritised Ethnic communities, from people living in wards with higher levels of deprivation and from surveying of members of the city's Emergency Food Network. (See Appendix 1).

Summary of the main themes emerging from the consultations, data and evidence

- We need a better food environment where healthy food is affordable and available to all.
- People want to maximise food growing in the city but lack access to land and skills. A more radical approach is needed such as ‘a right to grow’.
- Large caterers and food businesses have the power to transform food systems – relatively small changes here can have a bigger impact.
- Tackling food insecurity and reducing inequalities within the food system is a key priority. We need to transform the current crisis-based food bank model and move to a preventative one that includes better access to advice, help to maximise incomes and other support that prevents the need for food banks.
- Food needs to be prioritised in schools to give children a better start – a whole-school food policy or approach is required.
- People want more local, sustainable food but growers and producers need the infrastructure, land and routes to market to enable this.
- As well as reducing food (and packaging waste) we need to think ‘circular’ and invest in the power of composting to grow food and replenish our much-depleted soils

A Vision for a healthy sustainable and fair food system

- 3.17 The themes that emerged from the review and refresh process informed the Food Strategy Action Plan 2025-30. Feedback from the expert panel and 14 expert organisations and teams (including within the council) NHS Sussex and the Integrated Care System was then used.
- 3.18 Feedback included the desire to include less and more focused actions with metrics that can be systematically monitored and reported by action leads.
- 3.19 A proposed model for tackling food insecurity in Brighton and Hove was outlined and has informed the Thriving Communities Investment Fund.
- 3.20 The Food Strategy Action Plan will be delivered by a partnership approach led by Brighton & Hove Food Partnership, supported by the council and other partners. It is underpinned by partnerships and networks including community and voluntary sector, businesses, academia and health sector.
- 3.21 The action plan identifies deliverable actions over a five-year period. The overall focus is on prevention and on being proactive, rather than reactive.

Table 3 The 8 aims of Brighton & Hove's Food Strategy Action Plan 2025-30

1	Champion healthy and sustainable food
2	Take a preventative upstream approach to food poverty and ensure equal access to healthy food
3	Nourish a vibrant, diverse and skilled community food sector
4	Improve sustainability and security in urban, rural and marine food production
5	Encourage a vibrant and sustainable food economy
6	Transform catering and procurement and revitalise local food chains
7	Become a food use not a food waste city
8	Ensure healthy, sustainable, fair food is embedded in policy and planning, and has a high profile right across the city.

A more innovative approach

3.22 There are a number of areas for innovation that will be explored through the refreshed Food Strategy Action Plan, as well as positive developments that support the focus of the Plan, including:

- Economic mission - building on existing food and circular economy activity at a local neighbourhood level to decrease food poverty and provide opportunities for local people to engage with the city's climate response.
- Circular Economy - the Circular Economy Action Plan specifically progresses those activities with the potential to facilitate the transition to a circular food system, a transition necessary to achieve net zero and biodiversity targets.
- Food and Farming - the forthcoming Greater Brighton Food Plan offers the opportunity for collaboration at scale, replicating successful projects and developing future food system infrastructure and policy alignment.
- Education and skills - strength in the education sector has been demonstrated in the relationships with the University of Brighton, University of Sussex and Plumpton College who are all involved with the development and delivery of the action plan.
- Policy-making - junk food advertising is being tackled locally. There is a desire to see more focus on policy levers and practical action to improve children's wellbeing through a whole school approach to food.
- Multi-level governance – the council can support the BHFP to deliver actions and evaluate their impact through the Expert Panel, coordinating council-led delivery via existing groups.

4. Analysis and consideration of alternative options

4.1 No Cabinet endorsement was rejected as food work is integral to cross sector and major local policy documents and essential to delivering council

plan 'A fair and inclusive city' outcome tackling food poverty and food security for all.

- 4.2 The existing 2018-23 Food Strategy Action Plan could have been retained – rejected due to changing policy backdrop, desire for less and more focused actions and increasing levels of local, national and global food insecurity.

5. Community engagement and consultation

- 5.1 It is important the Food Strategy Action Plan is owned by partners and stakeholders from across the city. Members of the public were consulted through five city-wide events during January to July 2024 and expert teams/organisations (including teams within the council and colleagues in the Integrated Care System) have been consulted alongside gaining feedback from the expert panel. (See Appendix 1).

6. Financial implications

- 6.1 Recurrent pressure funding of £0.045m has been requested as part of the 2025/26 budget setting process. If approved as part of Budget Council this will support the Emergency and Affordable Food Networks where costs will need to be managed within the approved budget from 2025/26 onwards. Additionally, savings as part of budget setting have been proposed to use other funds releasing core general fund budgets as savings. Should this saving be agreed with alternative funding sources identified and service pressure funding agreed there will be no direct financial implication arising from the recommendation in this report.

Name of finance officer consulted: John Lack Date consulted: 13/12/2024

7. Legal implications

- 7.1 There are no direct legal implications arising from this report.

Name of lawyer consulted: Siobhan Fry Date consulted: 09/12/24

8. Equalities implications

- 8.1 The Food Strategy and Action Plan outlines how collectively as a city we can achieve a healthy, sustainable and fair food system for Brighton & Hove, from production and distribution to consumption and waste management. Brighton and Hove are unique in capturing this level of data. The whole action plan has been developed to reduce inequalities and be led by data to enable fair access to healthy, sustainable food for all residents.
- 8.2 An Equality Impact Assessment has been carried out and SMART actions are proposed (Appendix 2):
- Monitoring of Equality Diversity and Inclusion to be embedded through Food Strategy Expert Panel

- Improve our understanding and analysis of food insecurity data across the city working with data and intelligence teams in the council and the health sector
- Increase diversity in Expert Panel by inviting people with lived experience to specific meetings

8.3 This is a city strategy, led by the Brighton and Hove Food Partnership, with the council as one of the delivery partners supporting delivery and evaluation. Monitoring activity and evaluation must be appropriate and proportionate to the capacity of the council and the various partners.

9. Sustainability implications

9.1 The Food Strategy Action Plan 2025-30 will contribute towards the City Council's ambitions in response to the climate crisis. The actions have been charted in line with sustainable food and farming objectives in the City Downland Estate Plan and support the ambitions and aspirations of The Living Coast Biosphere. The food work offers the focus for collaboration to transition to net zero through work with e.g. working with the hospitality sector to develop circular food systems, with anchor institutions to increase procurement of local food and with local producers to shorten the supply chain and encourage regenerative practices.

10. Other Implications

Social Value and procurement implications

10.1 There are potentially positive social value and procurement implications through systematic monitoring of the BHCC Good Food Buying Standards.

Public health implications:

10.2 The Food Strategy Action Plan 2025-30 is aligned with Brighton and Hove's Joint Health and Wellbeing Strategy priority action area is 'A whole city approach to food and wellbeing will be adopted, prioritising those with the poorest diets or least access to healthy food'. It is also aligned to public health's whole system healthy weight work. The refreshed actions contribute to council Outcome 3 (a healthy city where people thrive) i.e. help develop prevention and family support work; help people to be physically active and maintain a healthy weight; and helping the city be age and dementia friendly. A Health and Well Being Board report is being prepared.

11. Conclusion

11.1 Cabinet is asked to endorse the Food Strategy Action Plan 2025-30 and be one of the partners involved in delivery and evaluation. The government requires action to improve food systems to succeed in two of its five missions: economic growth and a fit-for-future NHS. The Food Strategy Action Plan outlines how collectively as a city we can achieve a healthy, sustainable and fair food system for Brighton & Hove. It provides the

mechanisms and ways of working required to deliver action across partnerships and networks and to strengthen the city's food systems.

Supporting Documentation

1. Appendices

1. Brighton and Hove Food Strategy Action Plan 2025-30
2. Equalities Impact Assessment

2. Background documents

1. [Food Farming and Countryside Commission Food Conversation report 2024.](#)
2. [Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010.](#)
3. [Brighton and Hove Food Strategy Action Plan 2018-23](#)
4. [Working together to inform a fair food system in Brighton. University of Sussex Broadcast: News Item](#)

Brighton & Hove Food Strategy Refresh

Draft Action Plan 2025-2030

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Brighton & Hove Food Strategy Refresh

Draft Action Plan 2025-2030

Vision

Our vision is a city where everyone has the opportunity to eat healthy food from sustainable sources which treats those who produce it fairly. It is a city with a thriving local food economy and a vibrant food culture, where residents know where their food comes from and feel a connection to the people and the land and sea that provide it. It is a place that respects and enjoys food, where everyone can cook nutritious meals and many of us have the skills and opportunity to grow our own food. In this city food is valued and shared. We eat food that is good for us and for the planet and we waste less. Our public institutions play a key role in improving the food system by providing healthy food from sustainable sources while supporting our local farmers and producers.

Refreshing the city's Food Strategy Action Plan

Launched in 2006 the city's food strategy action plan is refreshed every 5 years. Brighton and Hove has pioneered place-based food work, adopting a partnership approach to food in 2003. Part of the wider Sustainable Food Places movement, we were the first place to achieve Silver Sustainable Food City status in 2015 and the first to achieve Gold in 2021.

The process of refreshing the city's food strategy action plan is overseen by the Food Strategy Expert Panel – a group of experts represented by business, academia, local government, the NHS, and the voluntary and community sector.

Led by evidence

The food strategy action plan was informed by a wide range of research and evidence. In March 2024, the University of Sussex Business School hosted an event where academics from Brighton and Sussex Universities Food Network (BSUFN) presented their research and helped inform the priority actions which would make the biggest impact.

Brighton & Hove Food Strategy Refresh

Draft Action Plan 2025-2030

The action plan was also informed by recent research partnerships including:

[Building Back Better from Below](#) - Harnessing Innovations in Community Response and Intersectoral Collaboration for Health and Food Justice Beyond the Covid-19 Pandemic

[Food Systems Equality](#) - Co-developing new products, new supply chains and new policy frameworks that deliver an affordable, attractive, healthy and sustainable diet.

[Cultivate Programme](#) - Helping cities navigate towards resilient and sustainable food sharing

[Green Wellbeing Alliance](#) evaluation report

Community-based circular food initiatives and continuous productive urban landscapes – The role of community initiatives in scaling and place-making for systemic change'.

[NHS Health Inequalities Project](#) - Understanding the experiences of people living with long term health conditions and disabilities in their ability to access the food they need to be well.

[Emergency food access research project](#): Food access needs of Black and Racially Minoritised communities and Refugee and Asylum seekers.

Consultative approach

Around 250 experts and members of the public were consulted on their priorities for the action plan. This included six city-wide engagement events focussing on: the food system; food and climate change; a more preventative approach to food insecurity; school meals; access to and consumption of fruit and vegetables, and public sector catering. We also used the recent work of our community researchers, individuals who are trained to conduct research in their own community. Over the past two years, they have been consulting people with lived experience of food insecurity.

The feedback from all the consultations, along with the data and evidence reviewed, were summarised into priority themes and used to inform the action plan. A full list of those consulted can be found at the end of this report in appendix I.

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The big issues we are addressing

The past five years have been turbulent, to say the least. The withdrawal from the EU, the Covid-19 pandemic and the War in Ukraine have meant big shocks to our food system, which is increasingly susceptible to climate change. The food system has also seen more focus and scrutiny, with the publication of the Government commissioned National Food Strategy, led by Henry Dimbleby. The following gives a summary of the context in Brighton and Hove.

Diet related ill health

While life expectancy has been steady, people are now living longer in poor health. Only 38% of adults in the city consume five or more portions of fruit and vegetables per day and one in three 11-year-olds are obese or overweight (up to two out of three in some schools). Obesity costs the NHS around £6.5 billion a year and is the second biggest preventable cause of cancer.

Food that's high in fat, salt and sugar is often more readily available and cheaper than healthier options and eating this kind of food regularly can cause obesity and other health problems. Parts of Moulsecoomb, Bevendean, Woodingdean, Whitehawk, Kemptown, Queens Park and Hangleton are in the top 20% of places in England with food desert characteristics – a mixture of low incomes, poor access to transport, and a limited number of food retailers providing fresh produce and healthy groceries for affordable prices.

Food poverty and inequalities

Sadly, food poverty has soared since the last action plan was published, exacerbated by the Cost-of-Living crisis. The 358 food parcels issued per week in 2018 seems tiny compared with 6,300 people reliant on emergency food provision each week in 2024 [BHFP Emergency Food Survey, 2024]. 1 in 4 children in the city (12,876) are living in poverty after household costs compared with an average of 1 in 3 across England. A higher percentage of our residents aged over 60 are living in income deprivation (17.8%) compared with the England average (14%).

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The climate and biodiversity crisis

Our food system is one of the biggest drivers of the climate and biodiversity crisis, so it is key that we only produce food that is needed with minimal impact on the environment. Between 8 - 10% of all human-caused greenhouse gas emissions could be reduced if we stop wasting food. Households in Brighton and Hove waste more than 21,000 tonnes of food and drink per year, around a third of residual household waste. The vast majority of this was avoidable and more than half of the food wasted never left its wrapping. [BHCC's Waste Composition Analysis, 2022]. Brighton & Hove's Circular Economy Route Map has a key target to halve food waste in the city by 2030.

The rapid global growth in industrialised meat and dairy production has led to the destruction of vast areas of forests, grasslands and wetlands to produce animal feed and has accelerated the climate and biodiversity crisis. Of all the mammals on Earth, 96% are livestock and humans, only 4% are wild mammals. If we are to meet our city's Net Zero and other environmental targets we must reduce our meat and dairy consumption and invest in a more localised and sustainable food system. The unique chalk downland surrounding our city has been shaped by animal grazing for centuries and is one of the most biodiverse landscapes in Europe. But less than 10% of the ancient chalkland survives. However, if carefully managed, grazing sheep and cattle on this landscape encourages biodiversity of wildlife & plants, reduces the use of chemicals, improves the soil quality (encouraging carbon capture) and supports the fragile chalklands, which for decades have filtered and protected our water supply.

Economic factors

Brighton and Hove has one of the lowest levels of housing affordability of all UK cities. For an individual earning an average income and renting a one-bed flat; most parts of the city would take up more than 30% of their pay. Overall wages have not kept pace with inflation in recent years, which means residents are on average £2,000 worse off in real terms per year than they were in 2011. Almost 1 in 10 of the city's residents earn below the national living wage. *[Brighton and Hove Economic Plan, 2024-2027]*

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Social Isolation

We have more people living alone in Brighton and Hove (35% of households), compared with the South East (28%) and England (30%).

Food Security

Brighton and Hove City Council owns 13,000 acres of farmland (most in the South Downs National Park), yet very little of this is used to produce food for the city.

The UK imports about 40% of its food. We are most reliant on imports of fruit and vegetables, producing only 17% and 55% respectively of what we consume. The impact of Brexit, supply chain disruptions, rising fuel prices and labour shortages have all impacted food prices. The Food Foundation's report Food Prices Tracker 2024 found that while the cost of a basket of food had risen by about 25% in the past 2 years, the cost of the veg in the basket had risen by 39% on average, with some items like carrots increasing by as much as 150%, pricing many people out of a healthy diet. Local food systems help local economies to thrive. Research by the New Economics Foundation and Growing Communities estimated that every £1 spent in their local veg box scheme generated £3.70 of value for customers, local farmers and the planet.

Our achievements

Championing Healthy Sustainable Food

Through the city's Green Wellbeing Alliance, 1,601 residents with complex needs were able to access food growing and nature, improving their physical activity (30%), wellbeing (50%), and social networks (40%). [GWA evaluation 2024]

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We continue to buck the national trend on childhood obesity. 31.6% of Year 6 children are overweight or obese compared with England 36.6% for England. [NCMP data 2022/23]

Breast feeding rates in the city remain 20% higher than national rates.

The 'Taste Ed' programme is being piloted in early years settings to promote consumption of fresh fruit and veg.

Healthy Start bitesize sessions were delivered to ~ 70 professionals across the city to increase take up.

BHFP opened the Community Kitchen providing more than 1000 community cookery sessions, including 1000 children and young people.

The City Downland Estate Plan is encouraging regenerative farming practices in order to increase soil health and biodiversity, cut carbon emissions and food miles.

Transforming catering and procurement

Primary school meals have reduced meat from five days per week to three.

Hospitals in Brighton have switched meat dishes from beef to more sustainable chicken, have improved menus for dementia patients and implemented "mealtime matter" where staff leave the wards so that patients can eat their meals without intrusion.

The Council's Good Food Standards for all council catering contracts were updated to Soil Association Food for Life Silver.

A vibrant and sustainable food economy

Diversity, independence and innovation is essential for a sustainable and healthy food system. As a city we have:

- A thriving restaurant scene, bringing money to our local economy and providing a market for local and sustainable produce.

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- Access to great quality, local produce thanks to enterprises such as The Sussex Peasant, Florence Road Market, Infinity Foods, Park Farm Shop, Sheep Share and Sussex Grazed.
- Promoted and celebrated good food through Visit Brighton, Restaurants Brighton's Bravo awards and events such as Apple Day, Stanmer Organics open day and Seedy Sunday.

A food use not a food waste city

There are now 55 community composting schemes serving 1200 households, turning 187 tonnes of food waste into high quality compost for local food growing.

Tackling inequality and social isolation

Nearly a thousand employers have signed up to the Brighton Living Wage campaign raising the salaries of almost 5,000 people

Brighton and Hove is a thriving hub of community cafes, lunch clubs and shared meals services which help to tackle social isolation, provide activities, support and advice as well as a nutritious, affordable meals.

Embedding change

Policy is key in ensuring real and lasting change. As a city we have embedded food into major local policy documents, including the City Plan, the Joint Health and Wellbeing Strategy, the Economic Plan, the Cost-of-Living Action Plan and anti-poverty approach, the Anti-racism Strategy, the Circular Economy Route Map, and the City Downland Estate Plan.

Leading the way

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As a city we:

- Became the first Gold Sustainable Food Place in the UK
- Developed the City Downland Estate Plan to protect and enhance the 13,000 acres of chalk downland that surrounds Brighton & Hove.
- Are developing the Greater Brighton Food Plan.
- Are a signatory city in the Milan Urban Food Policy Pact and the Glasgow Food and Climate Declaration.
- Are developing a whole-city approach to healthy weight

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Summary of the main themes

The themes emerging from the consultations, data and evidence are summarised here.

- We need a better food environment where healthy food is affordable and available to all.
- People want to maximise food growing in the city but lack access to land and skills. A more radical approach is needed such as 'a right to grow'.
- Large caterers and food businesses have the power to transform food systems – relatively small changes here can have a bigger impact.
- Tackling food insecurity and reducing inequalities within the food system is a key priority. We need to transform the current crisis-based food bank model and move to a preventative one that includes better access to advice, help to maximise incomes and other support that prevents the need for food banks.
- Food needs to be prioritised in schools to give children a better start – a whole-school food policy or approach is required.
- People want more local, sustainable food but growers and producers need the infrastructure, land and routes to market to enable this.
- As well as reducing food (and packaging waste) we need to think 'circular' and invest in the power of composting to grow food and replenish our much-depleted soils

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Draft Food Strategy Actions

Aim 1 - Champion healthy and sustainable food			
		Lead organisation (role)	How impact will be measured
1	<p>Prevent diet-related ill health</p> <ul style="list-style-type: none"> Continue to deliver and expand the Healthy Weight work across the city Promote city-wide healthy eating campaigns such as Sugar Smart and Veg Power 	<p>Public Health; Chair of Healthy Weight Programme Board</p> <p>Public Health; Supported by NHS, BHCC Families Children and Learning</p>	NCMP data; numbers of people completing Tier 2 weight management service; Safe and Well at School Survey (fruit and veg consumption); Health Counts Survey
2	<p>Tackle risk of malnutrition, under-nutrition and dehydration in older people and people with disabilities through better training, social care assessments, hospital discharge plans and delivered meal services</p> <p>Promote healthy food as part of hospital discharge plans where applicable</p>	<p>Ageing Well Partnership; Possability People Hospital Discharge Team</p> <p>NHS Sussex</p>	Data from training, social care assessments, hospital discharge plans and delivered meal services
3	Promote breastfeeding in the city and focus resources in the areas of the city with the lowest breastfeeding rates	Public Health; Sussex Community NHS Foundation Trust Infant Feeding Lead	Breastfeeding rates by city area

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4	<p>Produce a spatial food map of the city to identify:</p> <ul style="list-style-type: none"> Communities with poor / limited access to healthy food Potential spaces for community food growing, market gardens and productive urban landscapes Areas where community food projects could be linked, replicated or scaled up to create healthy food environments Areas that could benefit from food hubs, pantries, food waste composting etc. <p>Use these maps to inform BHCC city planning and regeneration teams</p>	Public Health; BHFP	Spatial map produced
5	<p>Develop a Whole School approach to food:</p> <ul style="list-style-type: none"> Review and align the support offered to schools around food and ensure this is coordinated by an embedded, schools-based role Align this with the whole school approach to sustainability, the school climate leaders and school food ambassadors 	Public Health; BHFP	<p>Funding secured for a schools-based lead officer</p> <p>School food action plan in place</p> <p>School leaders actively championing food and each school has a food ambassador</p>

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			<p>Cooking/food tech on the curriculum</p> <p>Taste Ed rolled out to primary schools</p> <p>More schools have on site growing and composting</p> <p>More school visits to farms</p>
6	<p>Further develop plans to support families to access healthy and sustainable food options across Family Hubs including:</p> <ul style="list-style-type: none"> • Access to affordable food schemes • Provide 1-1 Cost of Living interventions through Family Hubs to include information and advice around healthy and sustainable eating • Develop community growing gardens using outside spaces 	<p>Whitehawk Family Hub</p> <p>All Family Hubs</p> <p>All Family Hubs; BHFP; Plot 22</p>	<p>No of families attending the scheme</p> <p>No of families supported and reporting better outcomes at evaluation</p> <p>Gardens planned and in use, no of families attending and reporting better outcomes at evaluation</p>

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7	Define the next steps on restricting advertising of HFSS foods – For example use council owned advertising to promote healthier, sustainable food and environments	Public Health; Transport	Delivery of agreed next steps
8	<p>Provide opportunities for residents to access, learn about and enjoy healthy and sustainable food and to access nature for their health and wellbeing.</p> <p>Target these opportunities at groups that would most benefit e.g. therapeutic outdoor activity for people with mental health issues</p>	<p>Green Wellbeing Alliance Members</p> <p>Neighbourhood-based community food projects (e.g. gardening groups, meal sharing initiatives; affordable food schemes)</p> <p>[Supported by The National Trust; South Downs National Park Nature Access Network; The Living Coast UNESCO Biosphere]</p>	Bi-annual survey of community food organisations (BHFP)
Aim 2 - Take a preventative upstream approach to food poverty and ensure equal access to healthy food			
		Lead organisation (role)	How impact will be measured
9	Strengthen the nutritional safety net for children and young people by:		

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	<ul style="list-style-type: none"> Maximising enrolment / take up of free school meals Exploring options for direct consent so parents get additional information and support when applying for Free School Meals and Holiday Activities and Food Programme Improve take up of Healthy Start vouchers 	<p>BHCC School Meals Team Manager; Welfare, Revenues and Business Support (WRBS) Team;</p> <p>BHCC School Meals Team Manager</p> <p>Public Health; Family Hubs; Families Children and Learning</p>	<p>Improved take up rates</p> <p>Reduction in number of people presenting at food banks from annual EFN survey</p>
10	<p>Work with members of the Emergency Food Network to develop the city's food banks into a more preventative, area-based food hub model with streamlined referral routes, wraparound support services and <u>ladders</u> to food security.</p> <p>Ensure that support offered is cash first where possible, that food provided is culturally appropriate, accessible and provided in ways that promote <u>dignity</u> and inclusion.</p> <p><i>*Note that wraparound services can include access to financial and benefits advice, support with saving and budgeting, signposting to other support, e.g. immigration legal advice, access to job skills and volunteering etc. for people of all backgrounds.</i></p>	<p>BHFP; Members of the Emergency/ Affordable Food Network; Citizens Advice Brighton and Hove</p>	<p>Reduction in the number of people presenting at food banks (through the EFN survey)</p> <p>Clearer, more consistent signposting and referral pathways fewer gaps in provision</p> <p>Evidence of food ladders in operation</p>

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	<i>Food Ladders are community scale interventions aimed at building local level resilience in the face of food insecurity.</i>		
11	<p>Ensure the limited support available is effectively targeted at those most vulnerable in the city, using data from the Low-Income Family Tracker (LIFT), the Joint Strategic Needs Assessment (JSNA), the annual Emergency Food Network Survey, the Brighton and Hove Child Poverty Briefing and research on the food needs of those with protected characteristics, including responding to the Bridging Change report.</p> <p><i>Note: Public Health to request a JSNA deep dive on food insecurity in the city linked to healthy places/map).</i></p> <p>Research includes https://bhfood.org.uk/wp-content/uploads/2024/04/Emergency-Food-Access-Final-report-updated04042024.pdf, Bridging Change's report into the Emergency Food Access Needs of Black and Racially Minoritised Communities, Refugees and Asylum Seekers ; the NHS Health Inequalities Project on the food needs of people with disabilities and long-term health issues.</p>	BHCC and all delivery partners	Increased use of city data to target support available effectively e.g. reports, funding bids, research proposals
Aim 3 - Nourish a vibrant, diverse and skilled community food sector			
		Lead organisation (role)	How impact will be measured

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12	<p>Be the city that cooks – enable people to have the skills, confidence and equipment to cook healthy meals.</p> <ul style="list-style-type: none"> • Ensure all areas of the city have access to cookery classes and cook and eat groups and target them at those with low skills or confidence or who would benefit most from social interaction • Provide access to cookery equipment from welfare and other funds such as Local Social Discretionary Fund (LDSF) and Household Support Funding (HSF) 	<p>BHFP; Public Health; Community Kitchen</p> <p>Neighbourhood-based community organisations and those supporting communities of interest</p>	<p>Increase in number of cookery classes and cook and eat groups; all areas of the city covered</p> <p>Bi-annual survey of community food organisations (BHFP)</p>
13	<p>Be the city that eats together</p> <ul style="list-style-type: none"> • Support and enable community-based shared meal projects (places that tackle social isolation as well as provide a nutritious, affordable meal) to thrive. • Explore ways for projects to maximise their impact and reach through better linkages, 	<p>BHFP; Community shared meal projects [eg The Real Junk Food Project, Food and Friendship, Hop 50+, Chomp, Brighton Unemployed Families Centre]</p>	<p>Community food sector survey</p>

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	<p>opportunities for scaling up, access to funding, resources, training etc.</p> <ul style="list-style-type: none"> Promote opportunities to volunteer / support the 200+ community food initiatives (e.g food growing, shared meals, nature access, emergency and affordable food) 	BHFP; BHCC Economic Development; Trust for Developing Communities	
Aim 4 - Improve sustainability and security in urban, rural and marine food production			
		Lead organisation (role)	How impact will be measured
14	<p>Develop 'Edible Brighton and Hove'</p> <ul style="list-style-type: none"> Implement a 'Right To Grow' policy and pilot this in at least one neighbourhood to assess how this could be scaled up <i>(BHCC to maintain a free, accessible map of all public land that is suitable for community cultivation projects)</i> Implement the Open Spaces Strategy to maximise food growing and create a working group to oversee progress through joint working with Brighton and Hove Allotment Federation and BHCC Allotments to deliver allotment 	<p>BHCC/City Parks</p> <p>BHCC Cityparks; BHCC Allotments Manager</p> <p>BHCC Planning</p>	<p>Increase in land actively used for food growing;</p> <p>Increase in numbers of people growing food in all parts of the city</p>

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	<p>regeneration.</p> <ul style="list-style-type: none"> • Monitor all major planning developments for food growing and evaluate long-term impact • Create a prototype 'edible neighbourhood' or forest garden which could inspire new building developments and be replicated in other areas • Develop interest and skills around food growing through schools, community growing schemes and events such as Seedy Sunday • Develop a feasibility study for a beacon farm in Brighton & Hove that would be a centre for good practice, inspiration and education on sustainable food production and opportunities for public engagement 	<p>Cultivate project; BHCC Planning</p> <p>Community food growing spaces [eg BHOGG, Moulsecoomb Forest Garden, Stanmer Organics, Seedy Sunday, Whitehawk Community Food Project]</p> <p>BHCC CDE Programme Manager; BHCC Stanmer Estate Manager; BHFP LUP Project Manager</p>	<p>A space is created to increase public understanding of sustainable food production methods, nature friendly farming, and environmental impact of food choices</p>
15	<p>Implement a landscape scale model for climate and nature friendly agriculture, demonstrating partnership between the city council, farmers, nature conservation interests and other stakeholders. This includes:</p> <ul style="list-style-type: none"> • Identifying suitable land for local food growers 	<p>BHCC CDE Programme Manager; BHFP Land Use Plus Project Manager</p>	<p>Increase in biodiversity, including quality chalk grassland, across the CDE</p> <p>Increase in small scale and community horticulture across the</p>

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	<ul style="list-style-type: none"> • Implementing a conservation grazing hub model with routes into a locally branded meat supply chain • Implementing farmer-led training on conservation grazing and sustainable farming on the Downs • Facilitating and supporting farmers to work collaboratively at a landscape scale 	<p>City and Downland Estate</p> <p>Marginal and City Park land is grazed appropriately, leading to an improvement in quality</p> <p>Increase in the number of conservation grazing animals entering the local food system</p> <p>Increase in number of CDE tenant farmers switching to more regenerative farming methods</p> <p>Land Use is considered and discussed at a landscape rather than individual farm scale</p>
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16	<p>Develop the infrastructure, supply chains, financing and purchasing decisions required to support a local, regenerative food system in the long term</p> <ul style="list-style-type: none"> In collaboration with neighbouring local authorities develop business cases and seek investment in local food infrastructure, most pressingly ensuring the future of a local abattoir and investment in a livestock market 	BHFP LUP Project Manager BHCC; Sussex local authorities;	Appropriate funding streams identified and funding is secured
Aim 5 - Encourage a vibrant and sustainable food economy			
		Lead organisation (role)	How impact will be measured
17	Encourage and incentivise food businesses to improve sustainability through 'The Restaurant Sustainability Toolkit' supported by the University of Brighton and Restaurants Brighton.	University of Brighton; Restaurants Brighton	Indicators developed by the University of Brighton
18	Develop a model for a community-led and local SME based food system which supports food resilience, financial viability for producers, and access to food	BHFP LUP Project Manager	Learning hub established

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	<p>and nature for disadvantaged communities</p> <ul style="list-style-type: none"> Establish the Clubhouse at Waterhall as a hub for learning about nature-friendly farming and local food and as a venue for nature access for disadvantaged communities. 	BHFP; Supported by BHCC Rangers	
19	<p>Provide relevant skills and business support for local SME food businesses which includes environmental sustainability</p> <ul style="list-style-type: none"> Work with employers and further education providers to host a round table event in 2025 to explore ways that the food and hospitality industries which employ 14% of the local workforce can source skilled employees and promote careers in hospitality to young people 	BHCC; Curriculum Vice Principal Plumpton College; Teaching & Learning Lead - Hospitality & Catering Brighton MET	Round table event evaluation
Aim 6 - Transform catering and procurement and revitalise local food chains			
		Lead organisation (role)	How impact will be measured
20	All caterers in the city to:	Good Food Procurement Group	Caterers survey produced by BHCC

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	<ul style="list-style-type: none"> • adopt (at minimum) BHCC's Good Food Standards • provide at least one dish on the daily menu which is healthy, low cost and environmentally sustainable and branded in such a way as to be recognizable across the city – e.g. the Brighton Meal Deal • reduce consumption of meat by 30% and ensure all meat served conforms to UK animal welfare standards • take action to reduce-redistribute-recycle food waste and packaging and measure progress annually 		
21	Increase the number of small and medium sized food businesses participating in public procurement	Good Food Procurement Group; Land Use Plus Project	Number of SMEs able to access public sector food contracts such as schools, universities, colleges and care homes.
22	Update and monitor BHCC's Good Food Standards to ensure compliance by catering contracts, city events,	BHCC Food Policy Coordinator	More city caterers and food businesses are

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	street food traders and food businesses operating on council premises		using the standards in food procurement and catering practices
Aim 7 - Become a food use not a food waste city			
		Lead organisation (role)	How impact will be measured
23	Collaborate with citizens, community groups and schools to reduce food & packaging waste	Food Use Places Project and Partners	Progress reports
24	<p>Implement a domestic food waste collection and recycling service in the city. As part of implementation ensure that messages prioritise reduction over reuse and recycling and promote home and local composting options</p> <p><i>Note: This will be mandatory from 2026, however, BHCC aim to bring in from April 2025 if funding allows. Food waste will be in-vessel composted in Uckfield.</i></p>	BHCC; Cityclean	<p>No of households with food waste collections</p> <p>Volume of food waste collected over time.</p>
25	<p>Expand food waste collection and recycling service to all schools in the city</p> <p><i>Note: this will be mandatory from April 2025.</i></p>	BHCC; Brighton and Hove Schools	No of schools with food waste collections

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26	<p>Support and expand opportunities to compost as close to the source of food waste as possible to minimise carbon associated with transport, support the city's circular economy and maximise food growing. To include:</p> <ul style="list-style-type: none"> • Community composting for residents (wooden box schemes) • Community venues using compost tumblers • Local collection eg compost club • How to compost at home 	Food Use Places Project; Supported by BHCC CityClean; Compost Club	Volume of food waste composted and used for local food growing.
Aim 8 - Ensure healthy, sustainable, fair food is embedded in policy and planning, and has a high profile right across the city.			
		Lead organisation (role)	How impact will be measured
27	Building on the devolution opportunities, deliver a Regional Food Plan in collaboration with neighbouring authorities. Include food security in resilience planning to reduce the impacts of climate change, rising food and energy prices and potential disruption to global supply chains.	Greater Brighton Economic Board	Food plan produced and approved

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28	Continue to develop partnerships with universities, businesses and enterprises to ensure food policy is informed and supported by the latest research and technological innovations	BHFP; BHCC Food Policy Coordinator	<p>Policies are evidence-based, supported by peer reviewed research/data and informed by best practice that has been robustly evaluated.</p> <p>University partnerships help secure investment in the local food system.</p>
29	Use up to date evidence to ensure health and social care commissioners understand the importance of food activities and skills to health and wellbeing outcomes. This includes access to food growing, support around cooking and nutrition and connecting with nature.	BHFP	Track outcomes on food growing, cookery and access to nature activities.
30	Explore green finance and investment opportunities for the city's food work	BHFP; BHCC	More investment secured
31	Maintain the city's whole food systems approach, supporting BHFP to act as a connector for different parts of the food system to ensure broad participation and a high profile.	BHFP; BHCC; Food Strategy Expert Panel	More funding secured for whole systems food work in the city.

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	<ul style="list-style-type: none"> • Maintain Brighton & Hove's national and international lead in taking a place- based approach to food • Secure ongoing funding for BHFP's work • Be an active member of the Sustainable Food Places network. Share learning with other cities and organisations. • Submit evidence to national consultations and parliamentary enquiries, participate in national campaigns • Expand on our Gold Food City Status 		
32	Ensure food work is embedded in Net Zero action plans	Food Strategy Expert Panel	TBC

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Appendix 1: List of those consulted

Members of the public were consulted through the following city-wide events:

- BHFP & Free University Brighton's course 'From Farm to Fork: An introduction to food systems', Jan-March 2024
- Climate Change: BH public event: 'How to reduce the climate change impact of food in Brighton and Hove'. 29 February 2024.
- Beyond Food Banks: A more preventative approach to food support. 24 April, 2024.
- Secondary school students from Dorothy Stringer & Hove Park (consultation on school meals). 19 June 2024.
- FoodSEqual research: Food Policy Brief; Surveying members of the public on their access to and consumption of fruit and vegetables 29 June 2024.
- Good Food Procurement Group. 17 July, 2024
- BHFP's Annual General Meeting 1 October, 2024

The following experts and organisations were consulted:

- BHCC Public Health team
- Brighton and Hove's Healthy Weight Programme Board
- BHCC Food Policy Coordinator
- BHCC Senior Planning Officer
- NHS Sussex Integrated Care Board
- Brighton and Hove's Surplus Food Network

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- Brighton and Hove's Emergency Food Network
- [BHCC's Holiday Activity and Food Programme](#)
- Restaurants Brighton
- B&H Economic Plan stakeholder consultation
- Good Food Procurement Group members (network of city caterers),
- Fork & Dig It Community Supported Agriculture
- [The Compost Club](#)
- Brighton & Sussex University Food Network (BSUFN)
- Brighton and Hove Allotment Federation (BHAF)
- Brighton and Hove Organic Gardening Group (BHOGG)
- Brighton and Hove Allotments Manager
- BHCC Cityclean
- Food Matters
- Community Works
- Trust for Developing Communities
- Brighton and Hove Energy Services Cooperative (BHESCo)
- Brighton Metropolitan College Teaching & Learning Lead – Hospitality & Catering
- The Living Coast UNESCO Biosphere

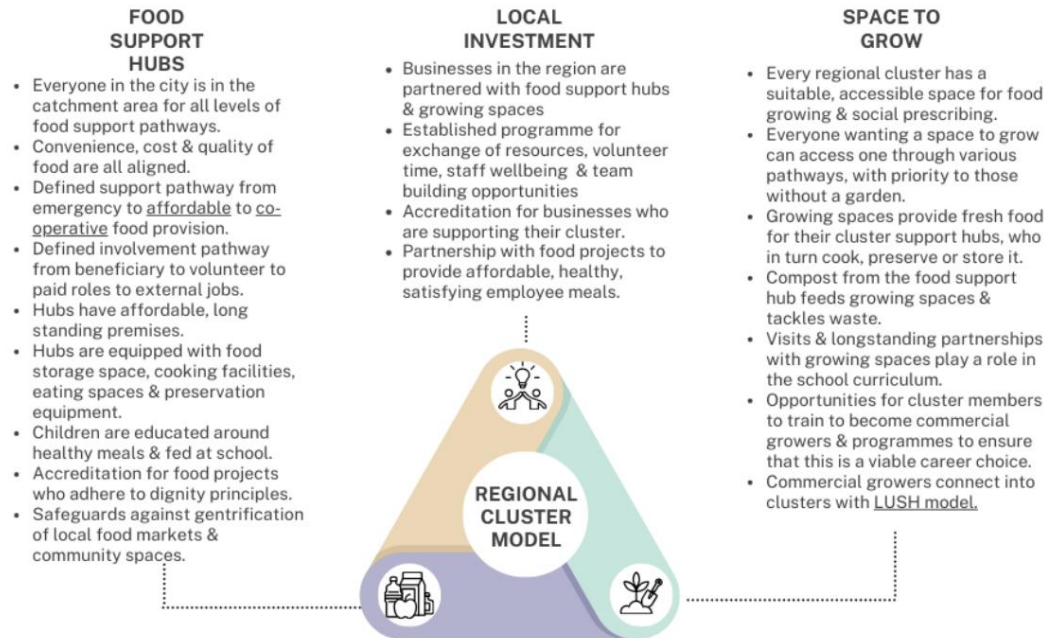
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Appendix 2: Proposed model for tackling food insecurity in Brighton and Hove

'Beyond Food Banks' – Next Steps

Every region of Brighton & Hove will be supported by a cluster model; providing wrap around food poverty support, opportunities to become an active food community member plus networking and CSR opportunities for local business.



Potential for navigators to be appointed to work within and between clusters

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Food Strategy Action Plan 2025-2030
Directorate:	City Services
Service:	Food Policy/Economic Development
Team:	Economic Development
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No, there are research reports & consultation findings

1. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Angela Blair, Food Policy Coordinator
Accountable Manager:	Peter Sharp, Economic Development Manager
Additional stakeholders collaborating or contributing to this assessment:	Brighton and Hove Food Partnership are the lead organisation with support from the council and other partners

1. About the activity

Briefly describe the purpose of the activity being assessed:

The Food Strategy Action Plan 2025-2030 has been developed following a recent review and refresh. The process of refreshing the city's food strategy action plan is led by Brighton and Hove Food Partnership and overseen by the Food Strategy Expert Panel – a group of experts represented by business, academia, local government, NHS, and the voluntary and community sector. Feedback included the desire to include less but more focused actions with metrics that can be systematically monitored and reported by action leads.

What are the desired outcomes of the activity?

The Food Strategy and Action Plan outlines how collectively as a city we can achieve a healthy, sustainable and fair food system for Brighton & Hove, from production and distribution to consumption and waste management. Brighton and Hove are unique in capturing this level of data. The whole action plan has been developed to reduce

inequalities and be led by data to enable fair access to healthy, sustainable food for all residents.

Which key groups of people do you think are likely to be affected by the activity?

All groups are likely to be affected as this is a city-wide strategy, but there are specific groups that may be particularly impacted. Priority groups identified in the Food Insecurity Groups Terms of Reference include:

- Adults with a disability or long-term health condition including learning difficulties
- Residents in temporary or emergency accommodation
- Vulnerable Council tenants
- Private sector households with vulnerable people not in receipt of council services
- Minoritised ethnic residents
- Refugees and Asylum seekers
- Households with:
 - Children in poverty
 - Children in need/with care plan
 - Children with disabilities or health needs
 - Looked after children

Work commissioned by the council and undertaken by Bridging Change outlined that 'There are particular access barriers for racially minoritised groups, refugees, migrants and asylum seekers such as lack of awareness of emergency food providers, language barriers, lack of availability of culturally appropriate food, lack of access to cooking facilities and the high cost of transport'. Bridging Change are a relatively new organisation with extensive experience working within Black and Racially Minoritised communities including within refugee and asylum-seeking communities. This experience involves tackling wide ranging issues including health, employment and mental health inequalities.

Specific examples of Equality Diversity and Inclusion (EDI) understanding of the protected and further characteristics and activities by Brighton and Hove Food Partnership includes:

"We have a close working relationship with the Clare Project with them hiring our kitchen on a regular basis. Over time as members of the trans/non-binary community have learnt that this is a safe and welcoming space we have seen an increase in trans/non-binary people attending our regular community spaces – the groups we run that bring together people from different backgrounds are an important part of our work in creating inclusive intersectional spaces around food.

Part of our proposal involves providing training for emergency food providers in issues of access and equality including acting on recommendations from the Bridging Change report and working with specialist providers such as Black and Minority Ethnic Community Partnership (BMECP) Food Bank and the Village Food Bank, (an initiative supporting LGBTQI+ people to access food and essentials in an affirming environment) to offer peer-to-peer learning".

1. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation has**

been done or it is not enough or in process – state this and describe your plans to address any gaps.

Groups listed below as part of the refresh of the Food Strategy Action Plan ongoing work:

List of those consulted

Members of the public were consulted through the following city-wide events:

- BHFP & Free University Brighton's course 'From Farm to Fork: An introduction to food systems', Jan-March 2024
- Climate Change: BH public event: 'How to reduce the climate change impact of food in Brighton and Hove'. 29 February 2024.
- Secondary school students from Dorothy Stringer & Hove Park (consultation on school meals). 19 June 2024.
- FoodSEqual research: Food Policy brief; Surveying members of the public on their access to and consumption of fruit and vegetables 29 June 2024.
- Good Food Procurement Group. 17 July 2024
- Brighton and Hove Food Partnership AGM – 1 Oct 2024

In terms of groups with protected characteristics, while most of the above events were open to anyone in the city, the FoodSEqual research is being conducted with people who use affordable food schemes and have lived experience of food poverty/ food insecurity. This includes a higher proportion of people with other protected characteristics including people from Black and Racially Minoritised communities, migrant communities, those with disabilities, and vulnerably housed etc.

The action plan was also informed by recent research which involved in-depth consultations with residents about access to food support:

[Emergency food access research project](#): Food access needs of Black and Racially Minoritised communities and Refugee and Asylum seekers.

[Food Systems Equality](#) - Co-developing new products, new supply chains and new policy frameworks that deliver an affordable, attractive, healthy and sustainable diet (consultations with people who use affordable food schemes).

[Green Wellbeing Alliance](#) evaluation report (feedback from service users experiencing poor mental health)

[NHS Health Inequalities Project](#) - Understanding the experiences of people living with long term health conditions and disabilities in their ability to access the food they need to be well.

The following experts / organisations were consulted:

- BHCC Public Health team
- Brighton and Hove's Healthy Weight Programme Board
- BHCC Food Policy Officer
- BHCC Senior Planning Officer
- NHS Sussex Integrated Care Board
- Brighton and Hove's Surplus Food Network
- Brighton and Hove's Emergency Food Network
- BHCC's Holiday Activity and Food Programme
- Restaurants Brighton
- B&H Economic Plan stakeholder consultation
- Good Food Procurement Group members (network of city caterers),

- Fork & Dig It Community Supported Agriculture
- The Compost Club
- Brighton & Sussex University Food Network (BSUFN)
- Brighton and Hove Allotment Federation (BHAF)
- Brighton and Hove Allotment Service
- BHCC Cityclean
- Food Matters
- Community Works
- Trust for Developing Communities
- Brighton and Hove Energy Services Cooperative (BHESCo)
- Brighton Metropolitan College Teaching & Learning Lead – Hospitality & Catering
- The Living Coast UNESCO Biosphere

There will be ongoing engagement through the National Lottery funded Food Use Places project involving 16 community organisations in Brighton and East Sussex. The focus is on engaging people that are currently under-represented in climate action, and it is a 4-year funded project. The groups involved already engage with diverse communities, including demographics traditionally underrepresented in climate action. By involving people across age, ethnicity, and social backgrounds, the project aspires to cultivate a culture of environmental stewardship for generations to come.

People living in temporary accommodation have been identified as a consultation gap that needs better understanding and potentially action. A key contact for temporary and supported accommodation now attends the Food Insecurity Group and is aware of both the Food Strategy Action Plan refresh and the Bridging Change report recommendations.

1. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	Yes through the Emergency Food Annual Survey
Disability and inclusive adjustments, coverage under equality act and not	Yes through the Emergency Food Annual Survey
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes through the Emergency Food Annual Survey
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	Yes through the Emergency Food Annual Survey
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Yes Healthy Start data is available but there have been

	problems with the national database.
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes through the Emergency Food Annual Survey
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	Yes through the Emergency Food Annual Survey
Socio-economic Disadvantage	Yes through the Emergency Food Annual Survey
Homelessness and associated risk and vulnerability	Yes through the Emergency Food Annual Survey
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	Yes offenders/ex-offenders, people with substance misuse issues, unemployed people, and older people, through the Emergency Food Annual Survey

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

The BHCC Equalities monitoring standards questions can be used to check where there are appropriate opportunities to gather data to align with bronze, silver or gold standard.

Rationale for not gathering data on e.g.:

- Religion, Belief, Spirituality, Faith, or Atheism
- Gender Identity and Sex (including non-binary and Intersex people)
- Gender Reassignment

[Research](#) shows that people who use community food support, food banks and other types of food support are experiencing trauma. The inability to provide food for yourself or your family has an impact on mental health, sense of wellbeing and physical health, causing feelings of emotional distress and guilt, while also affecting people’s sense of identity and status. Some monitoring questions will not be appropriate at the emergency food services. The Emergency Food Network Survey is repeated annually so there is an opportunity to update as necessary.

How will you gather this data to enable improved monitoring of impact for this activity?

Through:

- The Emergency Food Network Annual Survey – the survey gathers comprehensive data on people receiving emergency food support and we break down data by age (number of children, adults and older people), ethnicity, sexual orientation, by people in receipt of benefits, housing status, those with long term illness/disabilities, etc.
- The Thriving Community Investment Fund
- Household Support Fund
- Holiday Activities and Food programme data

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Quarterly updates on the emergency food needs action plan for Black and Racially Minoritised communities and Refugees and Asylum seekers are reported through the council's Fair and Inclusive Action Plan on the action plan developed from this research.

Monitoring as part of reporting to funders e.g. National Lottery, Esmee Fairbairn Foundation – also to council departments where grants/funding has been awarded. As part of the action plan review, we will be looking at data on take-up of free school meals, healthy start vouchers etc. The food strategy action plan also proposes to complete an annual survey of community food organisations which will tell us which groups with protected characteristics are being engaged to access, learn about and enjoy healthy and sustainable food and to access nature for their health and wellbeing

We plan for this information will be reported annually to the Food Strategy Expert Panel and EDI actions agreed for improvements.

1. Impacts

1. 6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement tell us that e.g. school food and education (whole school approach) is very important to people, in terms of immediate change needed and a hope for reducing food inequalities. [Food Systems Equality](#) Policy Brief June 2024 ‘Policies for transforming the UK’s food system: insights from Brighton and Hove’s local community

Positive impacts include

- A whole school approach to food and lifelong impact on young people
- [Improved nutrition and ageing well](#) for older people through social care plans
- [Improved nutrition in pregnancy and maternity](#)
- Beyond food banks work impacting all ages

Negative disproportionate impacts include:

- Digital exclusion, access, pension poverty and transport barriers for older people
- Lack of access to cooking facilities in temporary/emergency accommodation
- 1/3 people using emergency food services have children

2. 6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement tell us that there are common challenges to accessing the food needed e.g. product labelling, financial constraints; shared learning about physical accessibility and poor quality and choice of food in hospitals; and impacts of not getting the food needed on people's mental and physical health. [NHS Health Inequalities Project](#)

Positive impacts include:

- Fair provision of lunch clubs in the city (requires further mapping and checking of food bank data)
- One of the actions in the Food Strategy Action Plan is about providing support to community projects which includes rolling out the dignity toolkit and tailoring services to meet different needs including for disabled people
- Opportunities through the Beyond Food Banks work to look at need and improve services to meet local needs

Negative disproportionate impacts include:

- Type of food available in foodbanks can make it difficult to access food for some disabled people's dietary requirements e.g. surplus food, also dietary requirements e.g. gluten free, coeliac, vegan
- Physical accessibility, transport, parking
- Range of communication needs

What [inclusive adjustments](#) are you making for diverse disabled people impacted?

For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Currently no comprehensive approach of access to food related services for various types of disabilities, although NHS commissioned research provides useful recommendations.

3. 6.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement tell us that the predominant reason Black and Racially Minoritised communities and refugee and asylum seekers surveyed, are seeking emergency food is 'low income'. Rising house and rent prices and transport were other reasons. Over two thirds of the respondents were 'unaware' of other food services.

[Emergency food access research project](#)

Positive impacts include:

- Bridging Change action plan provides useful recommendations that are being worked through and reported quarterly into Fair and Inclusive Action plan
- Emergency food information available in different languages and instant translations are available on the Brighton and Hove Food Partnership website
- Opportunity for lived experience examples to be used to learn how to improve

Negative disproportionate impacts include:

- Plan doesn't address cultural diversity in food and food related services specifically
- Potential language barriers – need to work further with referral agencies
- Work required with foodbanks to raise awareness, confidence and practical action to become more accessible and inclusive to people with a range of disabilities
- Racial profiling or stereotyping could happen so requires education, awareness and training

4. **6.4 Religion, Belief, Spirituality, Faith, or Atheism:**

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far through opportunistic work with faith networks. We need more local data and engagement with regards to this protected characteristic.

Positive impacts include:

- Opportunity for faith networks to work together
- Opportunity to consider accommodating dietary requirements related to different religious beliefs

Negative disproportionate impacts include:

- Many foodbanks are in church buildings, and this may be off-putting for some people
- Can lead to focus being catering primarily for own faith communities

5. **6.5 Gender Identity and Sex:**

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups.

Positive impacts include:

- Opportunity to consider gender-sensitive approaches in food poverty and nutrition initiatives. The women’s centre and the village food bank are examples and the food strategy action plans around food insecurity plans to widen access like this so that all food banks are more inclusive and less stigmatising.

Negative disproportionate impacts include:

- No disproportionate negative impacts identified for this group at this time

6. 6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups.

Positive impacts include:

- Opportunity to consider further barriers that can be removed for trans/non-binary people with an intersectional approach. The village food bank is an example and the food strategy action plans around food insecurity plans to widen access like this so that all food banks are more inclusive and less stigmatising.

Negative disproportionate impacts include:

- Currently some food banks are located in religious buildings and can be off-putting to some LGBTQIA people.

7. 6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups.

Positive impacts include:

- Opportunity to consider further barriers that can be removed for trans/non-binary people with an intersectional approach. The village food bank is an example and the food strategy action plans around food insecurity plans to widen access like this so that all food banks are more inclusive and less stigmatising.

Negative disproportionate impacts include:

- Currently some food banks are located in religious buildings and can be off-putting to some LGBTQIA people.

8. 6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate positive or negative impacts identified for this group at this time.

9. 6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Previous consultation and engagement tell us that it is possible to [increase uptake of Healthy Start vouchers](#). Training sessions have continued through the Public Health lead and city-wide advertising as well as targeted awareness raising to families is required.

Positive impacts include:

- Better take up of Healthy Start for those on low incomes.
- Aim is to have more wrap around services in community food projects and better links to Family Hubs.

Negative disproportionate impacts include:

No disproportionate negative impacts identified for this group at this time.

10. 6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Although our local consultation and engagement has not specifically highlighted this group we are aware of new research from national anti-poverty charity Trussell Trust highlighting

that over a quarter (27%) of adults who have served in the UK's armed forces have run out of food in the last 12 months, and they did not have money to buy more. One in seven had used a food bank in the past year. As a group that are more likely to need food support e.g. food banks we know we need better local data to be able to monitor any impact.

Positive impacts include:

- Improving access to healthy, affordable food through Emergency Food Network
- Improving access to financial inclusion and advice services in collaboration with wider money and advice partnership

Negative disproportionate impacts include:

No disproportionate negative impacts identified for this group at this time.

11. **6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:**

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

We know that we need more information on food insecurity of destitute migrants in the city. Our consultation and engagement tell us that the predominant reason Black and Racially Minoritised communities and refugee and asylum seekers surveyed, are seeking emergency food is 'low income'. Rising house and rent prices and transport were other reasons. Over two thirds of the respondents were 'unaware' of other food services.

[Emergency food access research project](#)

Positive impacts include:

- Bridging Change action plan provides useful recommendations that are being worked through and reported quarterly into Fair and Inclusive Action plan
- Emergency food information available in different languages and instant translations are available on the Brighton and Hove Food Partnership website
- Opportunity for [lived experience examples](#) to be used to learn how to improve

Negative disproportionate impacts include:

- Plan doesn't address cultural diversity in food and food related services specifically
- Potential language barriers – need to work further with referral agencies
- Work required with foodbanks to raise awareness, confidence and practical action to provide culturally appropriate food where required
- Racial profiling or stereotyping could happen so requires education, awareness and training

12. **6.12 [Carers](#):**

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups.

Positive impacts include:

- We know that we need to collect/access data on carers to improve services
- Carers are more likely to be in poverty and needing food support
- Carers are also likely to be looking after people in poverty, with health needs and requiring food support

Negative disproportionate impacts include:

- No disproportionate negative impacts identified for this group at this

13. 6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups. We know that we need to collect/access data on looked after children, care leavers and fostering to improve services. We know that we need to find out more about care leavers and unaccompanied asylum-seeking children in the city as a key group of destitute migrants

14. 6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups. Impact Initiative Food Access Service has reported needs of those using their service in review meetings and progress reports. [Food Foundation research and recommendations.](#)

Positive impacts include:

- A better focus on the needs of those seeking help with food, moving from traditional food banks to preventative support with wrap around services.

Negative disproportionate impacts include:

- Those who are temporarily housed are more likely to fail to get their food needs met as don't always have access to cooking facilities.

15. **6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:**

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our consultation and engagement is so far opportunistic through ongoing networks/groups.

Positive impacts include:

- A review of food support across the city will enable us to focus on specialist food support and how and where that is delivered

Negative disproportionate impacts include:

- Those in domestic, sexual and other violent situations are more likely to need access to food support and may find barriers to traditional food banks requiring more specialist services

16. **6.16 Socio-economic Disadvantage:**

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/blind, ethnicity, expatriate background, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Our annual survey of food projects reveals 6,297 people need food support each week, with more than half seeking help on an ongoing basis. This is a similar number to the total beneficiaries supported in 2023, but still 18% higher than in 2022. 60 locations across all parts of the city offer food support. [Emergency Food Network Annual Survey 2024](#)

Positive impacts include:

- Improving access to healthy, affordable food through Emergency Food Network
- Improving access to nature, physical activity and wellbeing

- Improving access to financial inclusion and advice services in collaboration with wider money and advice partnership
- Improving access to cooking, food growing, food waste prevention skills through Community Kitchen, Green Wellbeing Alliance, Food Use Places,

Negative disproportionate impacts include:

- Although wide spread of emergency and affordable food project across the city, there are gaps

17. **6.17 Human Rights:**

Will your activity have a disproportionate impact relating to Human Rights?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

[Brighton and Hove Food Strategy Action Plan 2018-23](#)

Positive impacts include:

- The action plan supports human rights principles e.g. the right to food and health.

[The importance of having a local Food Strategy, by Olivier De Schutter - YouTube](#)

The former UN Special Rapporteur on extreme poverty and human rights talks here about the benefits of having a local Food Strategy and the importance of the work taking place in Brighton and Hove. He outlines 3 key benefits as below:

- Building a local food system making access to fresh nutritious food easier
- More local employment opportunities stimulating the local economy
- Poor families having access to an alternative to low cost high processed food

Equalities considerations must be made regarding non-discrimination and equal access in all food related services and respect for cultural diversity in food practices and education.

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

Intersectional groups that may be most impacted by the action plan include:

- QTIPOC (queer, trans and intersex people of colour) communities e.g. often having experience of disability and mental health challenges.
- Older disabled people
- Black and racially minoritised communities intersecting with faith communities
- Lone parents
- Refugees and asylum seekers
- People experiencing homelessness
- People on a low income and people living in the most deprived areas

1. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

Monitoring of Equality Diversity and Inclusion to be embedded through Food Strategy Expert Panel

Activities to fulfil your [SMART Action](#)

Support the Brighton & Hove Food Partnership to deliver actions and evaluate their impact through the Expert Panel

Council-led delivery to be co-ordinated via existing groups

- Annual reporting of updated Food Strategy Action Plan 2025-30 EIA monitoring data will enable the expert panel to assess impact on different protected groups
- Annual reporting of the Emergency Food Network will enable a wider understanding of food insecurity across multiple excluded groups

Reflection and agreement of EDI actions to ensure accessibility and inclusion for food-related services and information over the five years of action plan delivery

Improve our understanding and analysis of food insecurity data across the city working with data and intelligence teams in the council and the health sector

Activities to fulfil your [SMART Action](#)

Meet with data intelligence leads in 2025 to discuss data gaps and opportunities

- We know that we need more information on food insecurity of destitute migrants in the city
- We know that we need to find out more about care leavers and unaccompanied asylum-seeking children in the city as a key group of destitute migrants
- We know that we need to collect/access data on carers to improve services

Use this data to progress strategy actions and design more preventative services

Use this data to inform work with foodbanks to raise awareness, confidence and practical action to provide culturally appropriate food where required

Increase diversity in Expert Panel by inviting people with lived experience to specific meetings

Activities 1 to fulfil your [SMART Action](#)

Invite a diverse range of people from relevant food work to join the Expert Panel

Make the Expert Panel an exemplar of good practice in EDI by inviting people with lived experience to specific meetings as appropriate over the five years of action plan delivery. Engagement and participation will be recorded via attendance/acceptances.

1. Outcome of your assessment

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The focus is on the Expert Panel as the vehicle for change – both in the diversity of its membership as well as in its monitoring, reporting of EIA and ability to agree EDI actions for improvement. In this way the whole of the Food Strategy Action Plan Actions can be monitored and improved not only for their delivery impact- but for their EDI impact also.

Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

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Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The Food Strategy and Action Plan outlines how collectively as a city we can achieve a healthy, sustainable and fair food system for Brighton & Hove, from production and distribution to consumption and waste management. Brighton and Hove are unique in capturing this level of data. The whole action plan has been developed to reduce inequalities and be led by data to enable fair access to healthy, sustainable food for all residents. The SMART actions proposed here are to embed EDI actions in the process:

- Monitoring of Equality Diversity and Inclusion to be embedded through Food Strategy Expert Panel
- Improve our understanding and analysis of food insecurity data across the city working with data and intelligence teams in the council and the health sector
- Increase diversity in Expert Panel by inviting people with lived experience to specific meetings

This is a city strategy, led by the Brighton and Hove Food Partnership, with the council as one of the delivery partners supporting delivery and evaluation. Monitoring activity and evaluation must be appropriate and proportionate to the capacity of the council and the various partners.

Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

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Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Angela Blair, Food Policy Co-ordinator	11 Dec 2024
Accountable Manager:	Peter Sharp, Economic Development Manager	11-Dec-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

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EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and HEad of Service level approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	11-Dec-2024
EDI Manager:	Sabah Holmes	16-Dec-2024
Head of Communities, Equality, and Third Sector (CETS) Service: <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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Notes and recommendations (if any) from EDI Manager reviewing this assessment:

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Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

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Brighton & Hove City Council

Cabinet

Agenda Item 133

Subject: Greater Brighton Economic Board – Heads of Terms

Date of meeting: 23 January 2025

Report of: Cabinet Member for Finance and City Regeneration

Contact Officer: Name: Assistant Director - City Development & Regeneration

Tel: 01273 291666

Email: max.woodford@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 On 11 July 2024, NHS Sussex Integrated Care Board (ICB) wrote a letter to the Chair of the Greater Brighton Economic Board (“the Board”) formally requesting to join the Board.
- 1.2 At the Greater Brighton Economic Board Meeting on 16 October 2024, a decision was agreed that NHS Sussex ICB should become a constituent member of the Board, joining the Greater Brighton Business Partnership.
- 1.3 Extending the membership of the Board triggers a variance in the Board’s Heads of Terms that requires the formal ratification of all Joint Committee members; Adur District Council, Arun District Council, Brighton & Hove City Council, Crawley Borough Council, Lewes District Council, Mid Sussex District Council and Worthing Borough Council. Each member needs to individually ratify the membership of proposed new members in accordance with their own internal committee processes.
- 1.4 This report seeks approval from Cabinet to enable NHS Sussex ICB to become a member of the Greater Brighton Economic Board. Each local authority member of the Board is seeking equivalent approvals from their relevant decision-making bodies.

2. Recommendations

- 2.1 Cabinet agrees that NHS Sussex ICB joins the Greater Brighton Economic Board as a member of the Business Partnership.

- 2.2 Cabinet notes that these changes to the membership and Heads of Terms are dependent on the decision of all the local authorities represented on the Board agreeing that the new member be appointed.
- 2.3 Cabinet agrees to amend the Board's Heads of Terms and instructs the Monitoring Officer to amend the Council's constitution to reflect these amendments once they have been formally approved by all the constituent authorities.

3. Context and background information

- 3.1 The Greater Brighton Economic Board was founded in April 2014 as part of the Greater Brighton City Region's City Deal with Government.
- 3.2 The Board comprises the Greater Brighton Economic Joint Committee ("GBEJC"), on which the local authorities are represented; and the Greater Brighton Business Partnership ("GBBP"), on which the business, university and further education sectors, and South Downs National Park Authority are represented. Meetings of the Board comprise concurrent meetings of GBEJC and GBBP.
- 3.3 The following bodies are members of the Board:
- i. Adur District Council
 - ii. Arun District Council
 - iii. Brighton & Hove City Council
 - iv. Crawley Borough Council
 - v. Lewes District Council
 - vi. Mid Sussex District Council
 - vii. Worthing Borough Council
 - viii. Adur & Worthing Business Partnership
 - ix. Brighton & Hove Economic Partnership
 - x. Chichester College Group
 - xi. University of Brighton
 - xii. University of Sussex
 - xiii. South Downs National Park Authority
- 3.4 GBEJC comprises the bodies specified in paragraphs 3.3(i) to (vii); and GBBP comprises the bodies specified in paragraphs 3.3(viii) to (xiii).
- 3.5 Board membership has been extended twice since the Board's inception; Crawley Borough Council and Arun District Council joined the GBEJC in February 2018 and in October 2019 respectively.
- 3.6 In July NHS Sussex ICB wrote a letter to the Chair formally requesting to join the Board and attended the Board meeting on 16 July as observers.
- 3.7 When considering the request by Crawley to join the Board in 2018, it was agreed that the Board should adopt a fair and consistent approach to organisations that express an interest in joining, and for proposed new

members consideration would need to be given to the following five questions;

- i. Does the organisation buy into the Board's agreed vision and priorities?
- ii. Do they share economic characteristics and represent the Greater Brighton functional economic area?
- iii. Do they add capacity to help the Board deliver on its agreed vision and priorities?
- iv. Will they add to the Board's reputation, in terms of legitimacy, standing and reach?
- v. Are they going to actively participate and commit resource to supporting the Board and deliver the work programme?

This methodology was also employed with regards Arun District Council's request to join in 2019. All of these questions were answered positively in the [paper ratifying the extension of its membership and formally inviting the NHS Sussex ICB to become a constituent member of the GBBP](#). This paper was considered by GBEB on 16 October 2024.

- 3.8 A change in membership triggers a variance in the Board's Heads of Terms (see Appendix 1) that requires the formal ratification of all Joint Committee members.
- 3.9 The Integrated Care System that covers Sussex (NHS Sussex) is responsible for healthcare for 1.7 million people across Sussex. It employs 50,000 staff with the largest components being the 20,000 employees at University Hospitals Sussex and 8,000 at East Sussex Healthcare. The NHS in Sussex has an asset base that covers 236 GP Practices, 9 acute sites, and around 14 other sites. The NHS Sussex Integrated Care Board (ICB) has 850 employees, and commissions the services for NHS Sussex health care providers. It currently has contracts with 267 individual providers making the organisation a big driver of economic growth in the region, both with the number of people it employs and the amount it spends on procurement. The ICB has expressed an interest in becoming a formal member of the Board, which would broaden the geographical reach of the Board to all of Sussex.
- 3.10 NHS Sussex ICB attended the July Board meeting and Sussex Energy Launch as an observer. They have nominated a prospective representative to sit on the Board as well as a deputy and have also nominated a member of the Team to sit on the Programme Board. NHS Sussex ICB have also attended recent Sussex Energy meetings so are already participating in and adding value to the Board's work.

4. Analysis and consideration of alternative options

- 4.1 An alternative would be for membership to remain as it is currently, but for the reasons outlined above and in the paper reviewed by the Board on 16 October, the Greater Brighton Economic Board took the decision to extend

the membership to NHS Sussex ICB subject to the ratification of its existing Joint Committee members.

5. Community engagement and consultation

- 5.1 The Board was consulted on the request from NHS Sussex ICB to join the Board and took the decision to extend the membership. The governance committees of constituent Board members are being consulted given the required change to the Heads of Terms.

6. Financial implications

- 6.1 The Board agreed to extend membership to NHS Sussex ICB at its meeting of 16 October 2024. This decision requires ratification by all constituent board members.
- 6.2 NHS Sussex ICB will make a contribution towards operational costs. The Operational Arrangements 2024/25 was approved at the Board meeting on 16 July 2024, and therefore NHS Sussex ICS will make a contribution in line with funding calculations outlined in that report from 1 April 2025.

Name of finance officer consulted: Haley Woolard
Date consulted: (06/12/24)

7. Legal implications

- 7.1 The GBEJC which forms part of the Board is a joint committee established pursuant to section 102(1)(b) of the Local Government Act 1972. Cabinet has authority to approve the extension of the membership of the Board together with the amendment of the Heads of Terms of the Board (subject to the approval of the constituent members of the Board) to include NHS ICB as a GBBP member under Part 2E paragraph 1.5(k) of the Constitution.

Name of lawyer consulted: Siobhan Fry
Date consulted: (09/12/24)

8. Equalities implications

- 8.1 The NHS Sussex ICB and wider NHS organisations are committed to reducing health inequalities. By working closely with NHS Sussex ICB and wider health partners, the Board can better address the challenge associated with health inequality and create the conditions where more residents can benefit from inclusive growth.

9. Sustainability implications

- 9.1 There are no sustainability implications directly related to this report. However, both the Board and NHS Sussex ICB have ambitious targets associated with net zero, and this will be a strong feature of the future work programme.

10. Health and Wellbeing Implications:

- 10.1 As outlined in 8.1, with NHS Sussex ICB joining the Board, addressing health and wellbeing issues is likely to become a more prominent feature of the Board's focus moving forwards.

Other Implications

11. Procurement implications

- 11.1 There are no procurement implications directly arising from this report.

12. Crime & disorder implications:

- 12.1 There are no crime & disorder implications directly arising from this report.

13. Conclusion

- 13.1 Cabinet is asked to note the benefits of NHS Sussex ICB joining the Board and accordingly approve the extension in membership by agreeing the change to the Board's Heads of Terms.

Supporting Documentation

1. Appendices

- 1. Proposed Heads of Terms for Greater Brighton Economic Board, December 2024

2. Background documents

- 1. [Greater Brighton Economic Board decision that NHS Sussex ICB join the Board](#)

Appendix 1: Heads of Terms for Greater Brighton Economic Board (October 2024)

1. Establishment, Purpose and Form

- 1.1. The Greater Brighton Economic Board (“The Board”) shall be established from the Commencement Date.
- 1.2. The over-arching purpose of the board is to bring about sustainable economic development and growth across Greater Brighton (‘the City Region’). To achieve this, the principal role of the Board is to co-ordinate economic development activities and investment at the regional level.
- 1.3. The Board comprises the Greater Brighton Economic Joint Committee (“GBEJC”), on which the local authorities will be represented; and the Greater Brighton Business Partnership (“GBBP”), on which the business, university and further education sectors will be represented
- 1.4. Meetings of the Board comprise concurrent meetings of GBEJC and GBBP.
- 1.5. GBEJC shall be a joint committee appointed by two or more local authorities represented on the Board, in accordance with section 120(1)(b) of the Local Government Act 1972.
- 1.6. The Board may appoint one or more sub-committees.
- 1.7. For the two years starting with the Commencement Date, the lead authority for the Board shall be Brighton & Hove City Council (“BHCC”), whose functions in that capacity shall include the provision of scrutiny (see paragraph 4.3), management of the call-in and review process (see paragraph 8), and the support detailed in paragraph 12.
- 1.8. Unless the Board resolves otherwise, before the start of the third year following the Commencement Date, and every two years thereafter, the Board shall review the lead authority arrangements and, subject to paragraph 1.9, invite each of the local authorities represented on the Board to submit an expression of interest in fulfilling the role of lead authority for the subsequent two year period. The Board shall then instigate a procurement exercise to select the most appropriate authority for that role.
- 1.9. Notwithstanding the appointment of a successor lead authority pursuant to paragraph 1.8, the incumbent lead authority may retain such of their Accountable Body functions as are necessary to enable that local authority to comply with its on-going commitments and liabilities associated with its Accountable Body status.

2. Interpretation

- 2.1. In these Heads of Terms –
 - i. ‘Commencement Date’ means 1st April 2014.

- ii. 'City Region' means the area encompassing the administrative boundaries of BHCC, Adur District Council, Worthing Borough Council, Lewes District Council, Mid Sussex District Council, Crawley Borough Council and Arun District Council; and 'regional' shall be construed accordingly;
- iii. 'economic development' shall bear its natural meaning but with particular emphasis given to :
 - Employment and skills;
 - Infrastructure and transport
 - Housing;
 - Utilisation of property assets;
 - Strategic planning;
 - Economic growth.
- iv. 'Accountable Body' means the local authority represented on the Board carrying out the function set out in paragraph 12.2.

3. Functions

3.1. The Functions of the Board are specified in paragraph 3.2 below and may be exercised only in respect of the Region.

3.2. The functions referred to in paragraph 3.1 are as follows:

- i. To make long term strategic decisions concerning regional economic development and growth;
- ii. To be the external voice to Government and investors regarding the management of devolved powers and funds for regional economic growth;
- iii. To work with national, sub-national, regional and local bodies to support a co-ordinated approach to economic growth across the region;
- iv. To secure funding and investment for the Region;
- v. To ensure delivery of, and provide strategic direction for, major projects and work stream enabled by City Deal funding and devolution of powers;
- vi. To enable those bodies to whom section 110 of the Localism Act 2011 applies to comply more effectively with their duty to co-operate in relation to planning of sustainable development.
- vii. To incur expenditure on matters relating to economic development where funds have been allocated directly to the Board for economic development purposes; and for the avoidance of doubt, no other expenditure shall be incurred unless due authority has been given by each body represented on the Board.

3.3. In discharging its function specified in paragraph 3.2 (Viii) above, the Board shall-

- i. (save in exceptional circumstances) seek to invest funding on the basis of-

- a Proportionality, by reference to the economically active demographic of each administrative area within the city Region;
 - b Deliverability;
 - c Value for money and return on investment / cost benefit ratio; and
 - d Economic impact to the City Region as a whole.
- ii. Delegate implementation of that function to the lead authority, who shall also act as Accountable Body in relation to any matters falling within that function.

4. Reporting and Accountability

- 4.1. The Board shall submit an annual report to each of the bodies represented on the Board.
- 4.2. The Greater Brighton Programme Board shall report to the Board and may refer matters to it for consideration and determination.
- 4.3. The work of the Board is subject to review by an ad hoc joint local authority scrutiny panel set up and managed by the lead authority.

5. Membership

- 5.1. The following bodies shall be members of the Board:

- i. Brighton & Hove City Council
- ii. Adur District Council
- iii. Worthing Borough Council
- iv. Lewes District Council
- v. Mid-Sussex District Council
- vi. Crawley Borough Council
- vii. Arun District Council
- viii. University of Sussex
- ix. University of Brighton
- x. Chichester College Group
- xi. Brighton & Hove Economic Partnership
- xii. Adur & Worthing Business Partnership
- xiii. South Downs National Park Authority
- xiv. NHS Sussex Integrated Care Board

- 5.2. GBEJC shall comprise the bodies specified in paragraphs 5.1(i) to (vii); and GBBP shall comprise the bodies specified in paragraphs 5.1(viii) to (xiv).
- 5.3. Each of the bodies listed in paragraph 5.1 shall be represented at the Board by one person.
- 5.4. Each local authority member shall be represented at the Board by its elected Leader.
- 5.5. Each business sector member shall be represented at the Board by the Chairman of that member or by a person nominated by the Board of that member.

5.6. Each university member shall be represented by a Vice Chancellor or Pro Vice-Chancellor of that university or by a person nominated by that university member.

5.7. Each further education member shall be represented by its Principal or the Chair of its Governing Body or by a person nominated by that further education member.

6. Chair

6.1. The Chair of GBEJC shall, by virtue of his/her democratic mandate, be Chair of the Board

6.2. If the Chair of GBEJC is unable to attend a Board meeting, the Board shall elect a substitute from its local authority member representatives provided that no such member representative attending in the capacity of a substitute shall be appointed as Chair of GBEJC / the Board.

6.3. The Chair will be elected annually by members of the GBEJC. Election of the Chair will be conducted through a formal process performed by the Democratic Services Team of the Lead Authority. The elected Chair will be appointed at the first meeting of the Board in the new municipal year. A Chair may be re-elected but shall not serve as Chair for more than 4 years.

7. Voting

7.1. Each person represents a member of GBEJC, and each person representing a member of the GBBP, shall be entitled to vote at their respective meetings.

7.2. Voting at each of the concurrent meetings of GBEJC and GBBP shall be by show of hands or, at the discretion of the chair, by any other means permitted by law, and voting outcomes reached at those meetings shall be on a simple majority of votes cast.

7.3. Where voting at a meeting of GBEJC results in an equal number of votes cast in favour and against, the Chair of GBEJC shall have a casting vote.

7.4. Where voting at a meeting of GBEJC results in an equal number of votes cast in favour and against, the motion/proposal/recommendation under consideration shall fall in relation of GBBP.

7.5. Where the respective voting outcomes of GBEJC and GBBC are the same, that shall be taken as the agreed Board decision and the Board may pass a resolution accordingly.

7.6. Where the respective voting outcomes of GBEJC and GBBP differ, the Board –

- i. May not pass a resolution relating to that matter; and
- ii. May refer the matter to the Chief Executive of the lead authority, who may consult with members of the Board or such other persons as are appropriate, with a view to achieving agreement on the matter between GBEJC and GBBP by discussion and negotiation.

7.7. Where, pursuant to paragraph 7.6(ii), agreement is reached the matter at issue shall be remitted to, and voted upon at, the next meeting of the Board.

7.8. Where, pursuant to paragraph 7.6(ii), no agreement is reached the motion/proposal/recommendation at issue shall fall.

8. Review of decision

8.1. Decisions of the Board will be subject to call-in and review in the following circumstances:

- i. Where a local authority voted to agree a recommendation at a GBEJC meeting, but the decision of the Board was not to agree the recommendation.
- ii. Where a local authority voted against a recommendation at a GBEJC meeting, but the decision of the Board considered that the interests of the body they represent had been significantly prejudiced; or
- iii. Where any local authority represented on the Board considered that the interests of the body they represent had been significantly prejudiced; or
- iv. Where any local authority represented on the Board considered that the Board had made a decision beyond its scope of authority.

8.2. The procedure for requesting, validation, and implementing a call-in and review is specified in Schedule 1.

8.3. Where a request for call-in is accepted, the Board decision to which it relates shall be stayed pending the outcome of the call-in.

8.4. Following call-in, the panel convened to review a Board decision may refer the decision back to the Board for re-consideration. Following referral, the Board shall, either at its next scheduled meeting or at a special meeting called for the purpose, consider the panel's concerns over the original decision.

8.5. Having considered the panel's concerns, the Board may alter its original decision or re-affirm it. Paragraph 8.1 shall not apply to the Board's follow-up decision. In consequence, the latter decision may be implemented without further delay.

9. Substitution

9.1. Subject to paragraph 9.2, representatives are expected to attend all meetings however, where a representative of a member of the Board is unable to attend a Board meeting, a substitute representative of that member may attend, speak and vote, in their place for that meeting.

9.2. A substitute member must be appointed from a list of approved substitutes submitted by the respective member to the Board at the start of each municipal year.

10. Quorum

10.1. No business shall be transacted at any meeting of the Board unless at least one third of all member bodies are present, and both GBEJC and GPBBP are quorate.

10.2. Quorum for GBEJC meetings shall be three member bodies.

10.3. Quorum for GBBP meetings shall be three member bodies.

11. Time and Venue of Meetings

11.1 Ordinary meetings of the Board shall be convened by the lead authority and will rotate around the City Region.

11.2 The Chair of the Board may call a special meeting of the Board at any time, subject to providing members with minimum notice of two working days.

12. Administrative, financial and legal support

12.1 The lead authority shall provide the following support services to the Board:

- i. Administrative, as more particularly specified in the Memorandum of Understanding pursuant to paragraph 13;
- ii. Financial (including the Accountable body function specified in paragraph 12.2); and
- iii. Legal, comprising Monitoring Officer and Proper Officer functions in relation to GBEJC meetings.

12.2 The function of the Accountable Body is to take responsibility for the financial management and administration of external grants and funds provided to the Board, and of financial contributions by each member of the Board, as more particularly specified in the Memorandum of Understanding Pursuant to paragraph 13. In fulfilling its role as Accountable Body, the lead authority shall remain independent of the Board.

12.3 Other members of the Board shall contribute to the reasonable costs incurred by the lead authority in connection with the activities described in paragraphs 12.1 and 12.2, at such time and manner as the Memorandum of Understanding shall specify.

13 Memorandum of Understanding

13.1 Members of the Board may enter into a memorandum of understanding setting out administrative and financial arrangements as between themselves relating to the functioning of the Board.

13.2 The memorandum may, in particular, provide for –

13.2.1 Arrangements as to the financial contributions by each member towards the work of the Board, including:

13.2.1.1 The process by which total financial contributions are calculated;

13.2.1.2 The process for determining the contribution to be paid by each member;

13.2.1.3 The dates on which contribution are payable;

13.2.1.4 How the Accountable Body shall administer and account for such contributions;

13.2.2 Functions of the Accountable Body; and

13.2.3 The terms of reference for the Greater Brighton Officer Programme Board.

14 Review and Variation of Heads of Terms

14.1 The Board shall keep these Heads of Terms under review to ensure that the Board's purpose is given full effect.

14.2 These Heads of Terms may be varied only on a resolution of the Board to that effect, and subject to the approval of each body represented on the Board.

Brighton & Hove City Council

Cabinet

Agenda Item 134

Subject: Moulsecoomb Hub and Housing Project

Date of meeting: 23 January 2025

Report of: Cabinet Member for Housing & New Homes

Contact Officer: Stephen Marsden: Programme manager, Housing Supply

Email: Stephen.marsden@brighton-hove.gov.uk

Ward(s) affected: Moulsecoomb and Bevendean

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 The Moulsecoomb Hub and Housing project is an exciting, flagship scheme which represents a significant regeneration opportunity for Moulsecoomb and Bevendean, and for the city of Brighton & Hove.
- 1.2 The proposed scheme was granted Planning Approval in June 2023. This project has placemaking at its heart, providing extensive public realm and a skatepark alongside 212 new Affordable Homes, and a Community Hub comprising Youth services, GP surgery, pharmacy, community café, and library.
- 1.3 The Hub budget was approved by Policy and Resources Committee in April 2020. This report seeks a full construction budget for the residential scheme, and approval to enter into relevant contracts subject to project costs clearing the Council's financial hurdles. Additionally, this report seeks to increase the Hub budget by £800,000 as costs have risen in the time since budget approval was originally received.
- 1.4 The proposal in this report aligns with the Council Plan 2023-2027. In particular Priority 2 *A fair and inclusive city* and Outcome 3 *'Homes for everyone'*, which sets out a commitment to *'increase the number of new affordable homes delivered by the council and other registered providers'*. It will be funded by a mixture of council borrowing, Homes England grant and Brownfield Land Release Fund grant.

2. Recommendations

That Cabinet

- 2.1 agrees a full construction budget for the Moulsecoomb Housing project, as set out in the Part 2 Report
- 2.2 delegates authority to the Interim Corporate Director- City Operations to enter into relevant contracts for the construction of the Moulsecoomb Hub and Housing Project, in consultation with the Cabinet Member for Housing & New Homes
- 2.3 in the event of a successful application for funding, delegates authority to the Interim Corporate Director- City Operations to enter into a Grant Funding Agreement for Brownfield Infrastructure and Land (BIL) fund
- 2.4 delegates authority to the Interim Corporate Director- City Operations to enter into any Contracts required to access Homes England Grant Funding for the residential development

3. Context and background information

- 3.1 Building new homes on council land is a council priority. It is essential if City Plan housing targets are to be met and the city's housing crisis tackled. The New Homes for Neighbourhoods (NHfN) programme aims to proactively respond to the acute housing need in the city, and to build much-needed new rented homes on Council-owned land making best use of Council assets.
- 3.2 The Moulsecoomb Hub and Housing project is one of the largest and most ambitious initiatives to be undertaken by the Council. It forms a significant part of the New Homes for Neighbourhoods programme and delivers against numerous corporate objectives. The inclusion of the Community Hub and extensive public realm including a skatepark and 7-a-side 3G pitch puts placemaking at the heart of this proposal, and offers a significant regeneration opportunity.
- 3.3 The proposals have been shaped by extensive consultation over a number of years, and seeks to deliver significant local benefit, informed by the views of the local community.
- 3.4 A report approved by the then Strategy, Finance, and City Regeneration (SFCR) Committee in March 2024 provided an update to the project and gave approval to procure a contractor to deliver this scheme through a Design and Build route.
- 3.5 The Procurement Strategy split the tender into Lots, allowing appropriately sized contractors to bid for the Hub and Residential elements of the scheme. The procurement strategy also allowed for larger contractors to bid for the entire project.

4. Analysis of options

- 4.1 Tenders were received on 25 November 2025 and were evaluated by Officers from the Council, supported by consultants MGAC. The results of the Procurement process are outlined in Part 2 of this report
- 4.2 The preferred supplier is a large contractor with extensive experience of delivering construction projects in the private and public sectors, including Local Authority projects. They successfully bid for both Lots and will therefore be responsible for the Community Hub, the Residential element, and all public realm. The whole project will therefore sit under one contract, reducing risk to the Council, and allowing streamlined client-side project management.
- 4.3 The preferred supplier's tendered price was the lowest received. It is within the range of the pre-tender estimate and with the inclusion of mitigations passes the Council's financial hurdles. There is scope for significant Value Engineering that could be explored with the preferred supplier to reduce the tendered price. It is anticipated that significant savings can be made without impacting on the overall quality of the development.
- 4.4 The preferred supplier also scored highest on the quality element and gave confidence in their ability to deliver this project within programme and budget. Additionally, the bid committed to significant investment in the local community through a tangible, measurable Social Value framework which will form part of the contract.
- 4.5 In June 2021, Brighton and Hove City Council successfully applied for Brownfield Land Release Fund (BLRF) for grant funding and is in receipt of an allocation of £1.694m. This grant funding is intended to facilitate the development through paying for the enabling and site preparation works to release the land for development. The demolition of Hubs North and South, financed by BLRF commenced in 2024.
- 4.6 Given the complexity of the site and the need for new infrastructure, an application for Homes England Brownfield Infrastructure and Land (BIL) funding has been made. The application will be assessed in January 2025 and, should it be successful, the Council will be expected to enter into a Grant Funding Agreement with Homes England.
- 4.7 The application includes the costs associated with works necessary to unlock the site for housing, including a contribution towards the provision of the new Community Hub, linked to the delivery of the residential scheme by Planning Conditions. The shortfall in Hub budget will be addressed through this grant funding application.
- 4.8 It is anticipated that the residential scheme will be funded in part by Homes England funding. Separate funding applications will be made for each of the two phases, with phase one coming forward as social rented units, and phase two being made up of affordable rented units.

5. Community engagement and consultation

- 5.1 Extensive community consultation was undertaken for all sites during the design process. Statutory planning consultation was undertaken as part of the planning application process for each scheme. Further community engagement, including 'Meet the Contractor' events will be held as the projects progress.
- 5.2 The preferred supplier demonstrated their commitment to provide positive and pro-active stakeholder communications throughout the build programme, focused on bringing the community along with them and engaging them in the programme of social value.
- 5.3 They have already engaged with many of the important project stakeholders, and have committed to ensure all stakeholders are kept informed and involved at every stage. A local Community Liaison Officer (CLO), who will be the primary liaison between the site team and all stakeholders, including local businesses, residents, schools, and community organisations will be appointed. The role of the CLO will be to ensure clear and consistent communication and engagement about the build, and the social value to be delivered.
- 5.4 In order to ensure that the Moulsecoomb community continue to be involved in the decision-making process, a monthly meeting group will be established. This group will comprise key local influencers, representatives from diverse sections of the community, as well as members from the project team. Meetings will be held locally, and will revolve around structured agendas that facilitate discussion around the project's progress, social value delivery, upcoming construction activities, traffic movements, and to gather any feedback from the local community.

6. Financial implications

- 6.1 The detailed financial implications are included in the part 2 report, due to the commercial sensitivity associated with the proposal.

Name of finance officer consulted: Craig Garoghan
Date consulted : 23/12/2024

7. Legal implications

- 7.1 The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions and the needs of the district with respect to the provision of further housing accommodation. The Council also has the general power of competence under section 1 of the Localism Act 2011 to do anything an individual may generally do subject to any statutory limitations. Further the Council has powers under Section 111 of the Local Government Act 1972 which, permits the Council to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any

of its functions. The recommendations in this report are in keeping with these powers.

- 7.2 The Council is required to comply with the Public Contract Regulations 2015 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. A compliant procurement has taken place in which a JCT D&B 2016 contract, together with the Council's Schedule of Amendments for this project, was published. This type of contract and those Schedule of Amendments will be used as the terms to contract with the winning bidder.

- 7.3 The Council's Contract Standing Orders (CSOs) will also apply.

Name of lawyer consulted: Eleanor Richards
Date consulted (19/12/24):

8. Equalities implications

- 8.1 An increase in housing supply will extend opportunities to provide new, well designed homes to accommodate local households on the Housing Register and who are in housing need.

9. Sustainability implications

- 9.1 The New Homes for Neighbourhoods programme develops homes that are cost effective to live in and meet high standards of environmental sustainability to respond to the Climate Change and Bio-diversity Emergencies. Significant high quality landscaping proposals have been integrated into the scheme, and sustainable measures such as solar panels and Air Source Heat Pumps have been incorporated.
- 9.2 The Hub building will be built to BREEAM 'Excellent' standard. BREEAM (Building Research Establishment Environmental Assessment Method) provides a holistic sustainability assessment framework for buildings and is used to specify and measure the sustainability performance of buildings, ensuring that projects meet sustainability goals and continue to perform optimally over time.
- 9.3 The preferred supplier will carry out a Circular Economy Opportunities Assessment to help us understand the real impact products have over the lifetime of a building including demolition and reuse of materials. Circular economy principles will be applied to meet the targets of 20% recycled content, 50% reusable content at end-of-life, and 50% EPD target, as set out in BHCC's New Build Housing Sustainability Policy. They will divert 99% of waste from landfill by implementing stringent waste management protocols through their approved Site Waste Management Plan.

10. Health and Wellbeing Implications:

- 10.1 There are strong links between improving housing, providing new affordable homes and leisure facilities and reducing health inequalities. Energy efficient

homes which are easier and cheaper to heat are likely to have a positive influence on the health of occupants of the new homes.

- 10.2 The proposals include provision of GP surgery and Pharmacy within the new Hub building, bringing these services to the heart of Moulsecoomb.

11. Procurement implications

- 11.1 The procurement exercises outlined above have been carried out in consultation with the council's procurement team and are fully compliant with public procurement regulations.

12. Crime & disorder implications:

- 12.1 The project provides an opportunity to develop new, well-designed housing which has been shown to positively influence the rate of crime and disorder as well as the quality of life for future occupants.

13. Conclusion:

- 13.1 The Moulsecoomb Hub and Housing project is an exciting, flagship scheme with the potential to make a significant contribution towards meeting City Plan housing targets, tackling the city's housing crisis, and realising meaningful regeneration opportunities for the local community. The tender received from the preferred supplier represents excellent value for money, and a full construction budget should therefore be approved. The construction budget and BIL application are outlined in Part 2 of this report.

Brighton & Hove City Council

Cabinet

Agenda Item 135

Subject: Park & Ride

Date of meeting: 23 January 2025

Report of: Cabinet Member for Transport, Parking & Public Realm

Contact Officer: Name: Andrew Westwood – Head of Transport Projects & Engineering

Tel: 01273 292468

Email: andrew.westwood@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: Yes

Reason(s) Key: It is significant in terms of its effect on communities living or working in an area comprising of two or more wards.

For general release

1. Purpose of the report and policy context

- 1.1 This report sets out strategic options for how Park & Ride (P&R) can be delivered for the city.
- 1.2 The creation of a P&R facility will directly support the delivery of the Council Plan, particularly Outcome 1 - A city to be proud of – and the sub-outcomes: an accessible, clean and sustainable city, making it easier for people to move around.

2. Recommendations

- 2.1 That Cabinet agrees that the option to use of existing car parks within the City for Park and Ride (Option 2 in table 1 of this report) should be pursued along with the continuation of the development of a business case for a purpose built Park and Ride facility (Option 1 in table 1 of this report).

3. Context and background information

Policy context and current situation

- 3.1 P&R is recognised as a tool which can help deliver our transport policy objectives of reducing congestion, and the associated vehicle emissions, on key routes to, and within the city centre. Various council policies are written to facilitate or support the creation of a P&R facility including; CP9 of City Plan Part 1, DM34 of City Plan Part 2, and the Bus Service Improvement Plan (BSIP). Early work on the direction of travel for the Local Transport Plan 5 also includes strategic Mobility Hubs as a key policy intervention. P&R is supported by Council Plan (2023-2027) Outcome 1 – A city to be proud of – and sub-outcome ‘Make it easier for people to move around the city.’ At the regional level Transport for the South East’s (TfSE’s) Strategic Investment Plan (SIP) also supports the creation of strategic Mobility Hubs on the edge of Brighton & Hove.
- 3.2 Currently a P&R facility is based at the Withdean Sports Complex, in a northern suburb of the city. The car park has around 225 spaces, which serves the sports complex, associated pub and is sign-posted as a P&R for those wishing to access the city using the local 27 bus service. P&R also operates from the racecourse and Mill Road to the Amex stadium when Brighton & Hove Albion play at home.
- 3.3 Officers have assessed three strategic options for how additional P&R spaces can be delivered as set out in the table below. A purpose-built facility would typically have 500 - 1,200 spaces, be located at the edge of the city’s built-up area and have a high frequency bus service of 6 buses per hour.

Option	Opportunities	Risks	Recommendation
1.Purpose Built P&R	Large site and high-quality facilities. Offers choice for those driving.	High cost. Challenging to deliver Planning issues – South Downs National Park. Requires capital grant to fund.	Continue to pursue
2.Existing car parks	Flexible Low cost Scalable model Offers chose to those driving	Dependant on landowner co-operation. Sub-optimal size/ location. Dependant on bus company co-operation. Quality of P&R experience.	Proceed and deliver first site by summer 2025, scalable model for other sites
3.Do nothing	No cost	City centre congestion. Lack of driver choice.	Not recommended unless other options exhausted.

Table 1: strategic options considered for P&R delivery

Option 1 - Purpose-built Park and Ride

- 3.4 Feasibility work, largely focused on identifying sites, for a purpose-built P&R facility at the edge of the city dates back more than 20 years. Delivery of a purpose-built P&R facility cannot be achieved within the next two years, although it remains a long-term goal. It will require significant capital sums and the

development of a business case demonstrating that it is a project that delivers value for money. Business cases are typically created in three stages; a Strategic Outline Business Case, an Outline Business Case and Full Business Case. We have secured £50,000 of funding from TfSE to undertake work that will form part of the Strategic Outline Business Case.

Option 2 - Existing car parks & bus services

- 3.5 Several examples exist at other Local Authorities, where P&R facilities were initially launched at existing car parks and this supported the case for creating a purpose built P&R. Both Oxford and Portsmouth, which now operate purpose-built sites, began P&R schemes this way. Using existing car parks for P&R can be delivered much more rapidly than a purpose built facility. It can also inform how a purpose built scheme should operate.
- 3.6 While the Council owns some car parks that could be used for P&R we are also looking to work with third party landowners with suitably large car parks, as well as other stakeholders such as bus operators and Network Rail. These discussions are commercially confidential. The part 2 report contains an appendix setting out which sites are within scope. Sites have been grouped by transport corridor into the city and then ranked according to their potential. The first site is anticipated to be delivered by July 2025.
- 3.7 Using existing parking sites for P&R in Brighton & Hove will require software development, to deliver journey planning and integrated ticketing. We are in continuing discussions with incumbent and potential suppliers in order to facilitate this element, this broadly includes payment mechanisms, ANPR and car park capacity information for customers, information and signage.
- 3.8 Transport operators such as bus companies, rail and cycle hire often have their own technology platforms they are willing to adapt or share with the Council. Extensive marketing and communication is key for success as well as directing users as efficiently as possible to P&R sites with clear, visible signage. Future potential also exists to create Electric Vehicle Charging Hubs within suitable P&R sites to attract a higher proportion of sustainable journeys to the city.
- 3.9 We aim to establish a model for pricing, ticketing and customer information at an initial P&R site in summer 2025. This will be scalable to other locations in the city. Monitoring and evaluation of the summer 2025 P&R operation will produce lessons learned that can feed in to other sites as well as the business case for a purpose built site.
- 3.10 We will continue reviewing other cities' P&R models to inform our approach in both the existing car park and purpose built model. Useful examples exist in Portsmouth Southampton and Bournemouth. Portsmouth's purpose built P&R facility focuses on serving the visitor rather than commuter market. Southampton

use an existing edge of city car park to operate a P&R using existing bus services to a key employment site. In 2021 Bournemouth began operating seasonal P&R facilities from two existing car parks during the busy summer months.

- 3.11 The potential of event-based P&R will also be explored, building on the strong existing examples in the city of the AmEx P&R sites. This can build on existing work being undertaken as part of the Parking Review (brought to Cabinet in September 2024) such as re-naming car parks after close-by attractions to promote their use by visitors and making better use of existing car parks. Technology and innovation plays a key role in this for example linking to smart signage for city visitors regarding car park availability and app-based advance booking systems for P&R sites; and this will be considered as work continues on event-based and P&R solutions.
- 3.12 In addition to funding secured for work on creating a business case for a purpose-built P&R via TfSE, we have also submitted a request to the DfT to use £75,000 of BSIP funding for the delivery of existing car park P&R sites. This would focus on the necessary technology and marketing solutions to bring P&R forward.
- 3.13 Subject to the extent to which potential partners wish to explore the opportunity to host P&R from their sites, further considerations will include the levels of investment required to carry out further development work including; access points/parking layout/waiting facilities/bus services and infrastructure, and confirming an appropriate pricing and ticketing structure. The need for any planning permission and/or legal agreements will also be a key consideration.

Timeline

- 3.14 It is planned to bring forward the first existing car park P&R site by July 2025 to enable testing and learning that may utilise existing technology to begin with that can be supplemented with specific apps or shared platforms with partners or developed in-house. Within the next two years we plan to bring more P&R sites into the scheme to develop a strategic network of P&R.

4. Analysis and consideration of alternative options

- 4.1 Previous work on P&R has focused on long term options for a purpose-built site, taking into account the environmental, planning and transport constraints.
- 4.2 While this work continues, the focus is now on existing car park P&R for the city in order to enable this key project to move forward. Additionally, the existing car park sites will ensure key lessons learned can be fed into the longer-term proposals.

- 4.3 Do Nothing is also an option however this would not offer alternative travel choices for those who need to travel by car to the city, or help with the wider policy objectives mentioned in this report.

5. Community engagement and consultation

- 5.1 If and when viable sites for a purpose-built P&R facility are identified we will carry out a full public consultation. We continue to work with officers from the South Downs National Park Authority, as they are a key stakeholder, regarding potential implications of purpose-built P&R in the city.
- 5.2 Officers have contacted representatives of organisations who own or operate car parks that could provide existing car park P&R opportunities, and the B&H bus company, to progress discussions. Discussions will also be held at the city's Transport & Travel Partnership, which involves key strategic stakeholders for the city. A wider public call to identify existing car parks was publicised on 6 November.

7. Financial implications

- 7.1 The financial implications associated with this work are largely dependent on whether a council owned or third-party site is taken forward. £150k has been identified in the 2025/2026 financial plan under the line Revenue Support for feasibility of Park and Ride. An assessment of costs for council owned sites is ongoing but it is anticipated this sum will be sufficient if this option is taken forward.
- 7.2 Following the submission of an Expression of Interest, officers have secured £50,000 from a scheme development fund managed by TfSE that must focus on the business case for purpose-built P&R in the areas identified in their Strategic Implementation Plan. TfSE expect the funding to be spent by the end of 2024/25.

The submitted request to the DfT to use £75,000 of Bus Service Improvement Plan (BSIP) funding for the delivery of P&R facilities, alongside existing actions from the Parking Review, will focus on the necessary technology and marketing solutions to enable P&R. Should this request be rejected, alternative funding would need to be identified. As sites are brought forward for existing car park P&R, further considerations including potential capital investment to ensure the sites are functional for P&R would need to be considered.

- 7.3 Full implications of existing car park P&R will be reviewed at a future cabinet meeting.

Name of finance officer consulted: John Lack Date consulted (17/12/24):

8. Legal implications

- 8.1 There are no direct legal implications associated with this initial work to move forward with the new approach to delivering P&R at existing car park sites. Specific legal issues may arise when specific sites are brought forward.

Name of lawyer consulted: Katie Kam

Date consulted (17/12/24):

9. Equalities implications

- 9.1 Providing more P&R spaces to serve the city centre will increase transport choices and create more space on key routes for active travel and safer mobility by reducing traffic within central areas. Site specific impact assessments will be carried out as the business case continues to advance. Some existing car park P&R sites may not fulfil all equalities criteria and the approach will be to combine as many sites as possible to enable choices and full access to the scheme.

10. Sustainability implications

- 10.1 The citizens' Climate Assembly in 2020 highlighted the priority accorded to providing P&R for the city in order to assist in reducing carbon emissions. Reducing vehicles within the city centre will also help improve air quality and encourage greater use of sustainable travel options.

11. Health and Wellbeing Implications:

- 11.1 Reductions in the number of vehicles entering and leaving the central area will reduce the daily impacts of those vehicles and improve traffic flows on key routes and therefore reduce the associated emissions and noise. This will assist in creating quieter and cleaner environments that will reduce the impacts of traffic on people's mental and physical health and wellbeing.
- 11.2 The provision of P&R in the city would offer additional choices to those needing to use a car to visit the city, and would offer opportunities for increasing levels of physical activity via walking, wheeling and cycling. This is in line with the Joint Health & Wellbeing Strategy (2019-2030) key area for action: 'Brighton & Hove will be a place which helps people to be healthy.' This is further supported by the Physical Activity Strategy 2024-2034 'Let's get moving', within which 'Active Environments' are a key priority, ensuring that built environments offer safe, accessible spaces that encourage people to be more active.

Other Implications

12. Procurement implications

- 12.1 There are no immediate procurement implications associated with this report. The need for further detailed work or commissioning relevant suppliers would be subject to progressing an individual sites(s).

- 12.2 Progression of the work with TfSE to assess strategic locations for a purpose-built P&R model will be subject to the completion of an agreed study brief and procurement process for consultants. This will be conducted either via the council's professional services contract or using a procurement method via TfSE. The aim is to have the work completed by April/May 2025.

13. Conclusion

- 13.1 This report sets out a proposed approach for delivering more P&R spaces in the city, building on key examples from other towns and cities. Cabinet is asked to delegate authority to deliver existing car park P&R sites with key partners in the city, this work would take place concurrently with further Business Case work on purpose-built P&R sites.

Supporting Documentation

1. Appendices

Map and table of sites in scope (part 2 report- copy circulated to Members only).

2. Background documents

1. Park & Ride site study (Jacobs consultants)
2. City Plan Parts 1 and 2
3. LTP5 Direction of Travel document

Brighton & Hove City Council

Cabinet

Agenda Item 136

Subject: Microsoft licence renewal

Date of meeting: Thursday, 16 January 2025

Report of: Cabinet Member for Adult Social Care, Public Health and Service Transformation

Contact Officer: Dan Snowdon: Head of Engagement and Digital Innovation, IT & Digital
Email: dan.snowdon@brighton-hove.gov.uk

Ward(s) affected: N/A

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to support the delivery of outcome 4 of our Council Plan, to ensure a responsive council with well-run services by ensuring necessary licenses are in place for the essential Microsoft applications that support the daily operation of council services. The council is committed to using technology, data and digital tools to increase our efficiency and accessibility and the Microsoft office tools underpin the delivery of this mission.
- 1.2 The report outlines our approach to procurement which will ensure that best value is achieved in securing agreements over the next 3 years for these Microsoft licenses.

2. Recommendations

- 2.1 Cabinet delegates authority to the Interim Corporate Director, City Operations to take all necessary steps to use the NHS Digital Workplace Solutions Framework to procure a Licence Solution Partner (LSP) for the Council.
- 2.2 Cabinet delegates authority to the Interim Corporate Director, City Operations to Award a contract to the successful Licence Solution Partner (LSP) to provide the Council with three Microsoft Enterprise Licence Agreements for a term of 3 years with an estimated total value of up to £4,000,000.00

3. Context and background information

- 3.1 The proposed procurement supports the delivery of Outcome 4 of the Council Plan - A responsive council with well-run services. Having a modern, secure, and accessible IT estate helps our staff to work better by giving them the equipment and the support they need to work confidently and effectively.
- 3.2 Microsoft technologies are an essential part of the Council's digital agenda and drive to modernise the council's use of AI, data and productivity tools. In particular, the M365 suite provides tools like Microsoft Teams for seamless collaboration and remote working, empowering staff to work flexibly and deliver services more effectively across departments and locations. Teams will also become the primary telephony platform for the Council from February 2025.
- 3.3 With SharePoint and OneDrive, document management and information sharing are becoming streamlined, ensuring better access to data and improved decision-making. M365's security and compliance capabilities, including Defender and Information Protection, safeguard sensitive citizen data while meeting regulatory standards. Additionally, tools like Power Automate and Power Apps will be central to the replacement of the legacy Finance and HR applications and to underpin key process automation and innovation, reducing manual effort and enhancing operational efficiency.
- 3.4 By leveraging these capabilities, BHCC is equipped to improve service outcomes, deliver cost savings, and advance the digital transformation agenda, with improved working with partners and a better resident digital experience.
- 3.5 Microsoft's licensing operates on a three-year cycle, during which its local government customers commit to licensing agreements that lock in pricing and terms for software and services. This medium-term lock-in of pricing ensures predictable costs and access to the latest technology but requires renewal or renegotiation at the end of each term to continue usage.
- 3.6 The purpose of the contract is to provide the licence coverage for the Microsoft end user applications and back-office server infrastructure used to deliver business applications to the Council. This includes Operating Systems, user access licences and other software such as Microsoft Office providing email, word processing and spreadsheet functionality all critical for the Council to carry out its functions. The contract is managed in-house by the Head of Enterprise Technology and Systems, who manages similar contracts across East Sussex County Council and Surrey County Council. This provides resilience in contract management, and sharing of expertise across the 3 Orbis partner authorities.
- 3.7 The council currently utilises a KCS Framework Agreement for a call-off contract with Bytes Limited for the provision of their Microsoft Licences. The contract covers three separate licence agreements all of which expire on

30th June 2025. Two of the agreements cover end user licences for the corporate and educational users, this includes productivity tools such as Microsoft 365 (Word, Excel, Teams etc), Copilot (AI functionality) and the operating system (Windows 11). The third covers the licencing for core IT infrastructure such as SQL server and Azure Cloud services. There is no option to roll forward and extend these agreements beyond the 3-year term and a procurement is required.

- 3.8 The current licences expire at the end of June 2025 and there is now a requirement to procure the licences for the next three-year term. A review of sourcing route options has been undertaken please see Appendix 1.
- 3.9 The current total annual cost of the Microsoft service is £1.25m. It should be noted that the pricing for Microsoft products has increased and that the annual costs will increase regardless of the sourcing route selected. The increase has been built into the budget for 2025/6.

4. Analysis and consideration of alternative options

- 4.1 The review of sourcing options has identified that the NHS Framework would provide the most advantageous route to procure the licensing. The NHS Framework has a number of advantages in that it is a compliant procurement route and adheres to Public Contracts Regulations (2015), the Terms and Conditions are designed specifically for the Public Sector and it provides options for mini competition. This means that the framework accords with the Councils' needs and there is opportunity to seek additional value through competition between 28 suppliers who are market leaders. The fees associated with this framework are the lowest thereby maximising the opportunity for cost reduction. The incumbent provider is not a party to the framework but previous providers and other market leading Microsoft partners are on the framework.
- 4.2 Alternative frameworks include the Kent Commercial Services framework which is also fully Find a Tender (FTS) compliant and adheres to Public Contracts Regulations (2015). Its Terms and Conditions are designed specifically for the Public Sector and it provides options for mini competition, however the current iteration of the framework no-longer features a rebate of 0.75% to the Orbis authorities. Under the current contract each year a 0.75% rebate is claimable against the total value of each contract.
- 4.3 Using a full open market tender was rejected as suitable frameworks exist thereby providing a faster and less resource intensive route to market.

5. Community engagement and consultation

- 5.1 Engagement with staff across the council takes place through our internal digital skills team, who provide support and development to support users to make the best use of our Microsoft tools. Digital skills training has been developed, supported by digital champions who have applied and shared learning across the council. Most recently, staff have been involved in a trial of co-pilot, an AI tool as part of the Microsoft suite of tools that has been rolled out. This learning informs the continued development of the tools and

informs the plan to continue to embed these tools with renewed licenses as recommended in this report.

- 5.2 In addition, expertise across the Orbis has been provided to support the council's learning about the best use of Microsoft tools, and to inform the recommendation that BHCC continue to use the tools and use the appropriate route to market to ensure best value.

6. Financial implications

- 6.1 The report recommends that Cabinet delegates the responsibility to procure a three-year contract for three Microsoft Enterprise Agreements at a total cost of £1.250m per year. This is a renewal of licences and therefore the annual licence costs are already built into the IT & Digital revenue budget. Any updates to the cost of renewal will be reported back to Cabinet through the Targeted Budget Management (TBM) process.
- 6.2 It is expected that leveraging the capabilities of the Microsoft stack will create efficiencies and improve future service outcomes. This will be considered as part of the council's wider digital transformation plans and any associated cashable savings will be built into the Medium Term Financial Plan.

Name of finance officer consulted: Haley Woollard Date consulted:
(20/12/24)

7. Legal implications

- 7.1 The Council is required to comply with the Public Contract Regulations 2015 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. Using a Framework such as the NHS Digital Workplace Solutions Framework is a compliant route to market. The Councils Contract Standing Orders (CSOs) will also apply to this procurement exercise.

Name of lawyer consulted: Eleanor Richards Date consulted (13/12/24):

8. Equalities implications

- 8.1 There are no implications for Brighton & Hove residents. Any impacts on internal staff related to the use of Microsoft tools will continue to be managed by services via the workplace adjustments process.
- 8.2 There are no TUPE implications because of this new contract and the resulting Microsoft agreements.

9. Sustainability implications

- 9.1 We do not envisage any direct sustainability implications arising from this tender however we will be asking bidders to provide their own sustainability policies as part of the tender process (for information only) and asking that

they adhere to our own sustainability policy if/when working on Council premises.

9.2 Microsoft have several initiatives under its Corporate Social Responsibility (CSR) program aimed at creating social value. The councils can access these initiatives and training courses through on-going supplier management rather than the partner contract. Their key focus areas include:

- Expanding Opportunity: Microsoft focuses on ensuring everyone has the skills to thrive in a digital economy. This includes training and certifying millions of people globally with in-demand skills.
- Earning Trust: The company is committed to the responsible use of AI, protecting privacy, and advancing digital safety and cybersecurity.
- Protecting Fundamental Rights: Microsoft promotes responsible business practices, expands accessibility and connectivity, and advances fair and inclusive societies.
- Advancing Sustainability: Addressing climate change is a major focus, with initiatives aimed at reducing carbon emissions and promoting sustainable practices.

9.3 As we intend to use an established Framework it is worth noting that providers are not obliged to offer Social Value/Community Wealth Building commitments, however officers can incorporate a question in the mini competition to address this. An appropriate question will therefore be devised based on common outcomes from the Brighton and Hove Social Value Framework with responses being evaluated by the panel.

10. Health and Wellbeing Implications:

10.1 We do not envisage any health or wellbeing implications arising from this tender.

Other Implications

11. Procurement implications

11.1 The procurement exercises outlined above will be led by Surrey Council who is procuring these agreements on behalf of all 3 Orbis authorities, in consultation with the Council's procurement team. The cabinet advisor for contract Management and procurement was consulted on 09/11/2024. All routes to markets detailed in Appendix 1 are fully compliant with the Public Contract Regulations 2025 and the Council's Contract Standing Orders.

12. Crime & disorder implications:

12.1 We do not envisage any implications on crime or disorder prevention services arising from this tender.

13. Conclusion

- 13.1 This report recommends that the Cabinet delegates authority for the procurement and award of a contract for a Licence Solution Partner (LSP). Council officers will ensure the most appropriate, cost effective, flexible and compliant licensing solution is implemented to meet the current and future needs of the organisation.

Supporting Documentation

1. Appendices

1. The options for route to market

Option 1	Framework Mini Competition
Description	A tender using NHS Digital Workplace Solutions (DWS) framework agreement where suppliers on the framework can competitively bid for the contract.
Pros	<ul style="list-style-type: none">- Fully compliant with Public Contracts Regulations (2015).- Terms and Conditions designed specifically for the NHS and Wider Public Sector.- Features 28 suppliers providing higher potential for competitive bids.
Cons	<ul style="list-style-type: none">- The council is limited to the suppliers on the framework.

Option 2	Framework Mini Competition
Description	A tender using Kent County Council via Procurement Services - Software Products and Associated Services framework agreement where suppliers can competitively bid for the contract.
Pros	<ul style="list-style-type: none">- Fully compliant with Public Contracts Regulations (2015).- Terms and Conditions designed specifically for Public Sector organisations.- Features 24 suppliers providing higher potential for competitive bids.
Cons	<ul style="list-style-type: none">- The council is limited to the suppliers on the framework.

Option 3	Open tender
Description	A tender to the open market using the Councils Procurement Portal.
Pros	<ul style="list-style-type: none">- Allows for the maximum number of bids.
Cons	<ul style="list-style-type: none">- Can attract a large number of bids requiring significant resources to evaluate.- Bespoke terms and conditions to be drafted by Legal.- Unnecessary time and resource consuming when existing frameworks are available.

	<ul style="list-style-type: none"> - It is unlikely to secure savings beyond those offered through a framework as Crown Commercial Services have fixed the licence pricing on behalf of the public sector.
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Brighton & Hove City Council

Cabinet

Agenda Item 137

Subject: Council Tax Base and Business Rates Retention Forecasts 2025/26

Date of meeting: Thursday, 23 January 2025

Report of: Cabinet Member for Finance & City Regeneration

Contact Officer: Name: Haley Woollard, Deputy Chief Finance Officer

Tel: 01273 291246

Email: haley.woollard@brighton-hove.gov.uk

Ward(s) affected: (All Wards)

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 The council tax base represents the amount that would be raised by setting a £1 council tax on a band D property. It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the council tax in 2025/26 before 31 January 2025.
- 1.2 There is a statutory requirement placed on all business rates collection authorities to calculate how much business rates income each authority is likely to receive for the coming year. Members will be aware there is considerable volatility in business rates income which makes it difficult to forecast, and the council is highly reliant on the data and decisions of the Valuation Office Agency (VOA).
- 1.3 The purpose of this report is to provide information to enable Members to agree the council tax base for 2025/26 and note the estimate of income through the Business Rates Retention Scheme.

2. Recommendations

- 2.1 That Cabinet agrees the calculation of the council's tax base for the year 2025/26.
- 2.2 That Cabinet notes the collection rate assumed is 98.75%.

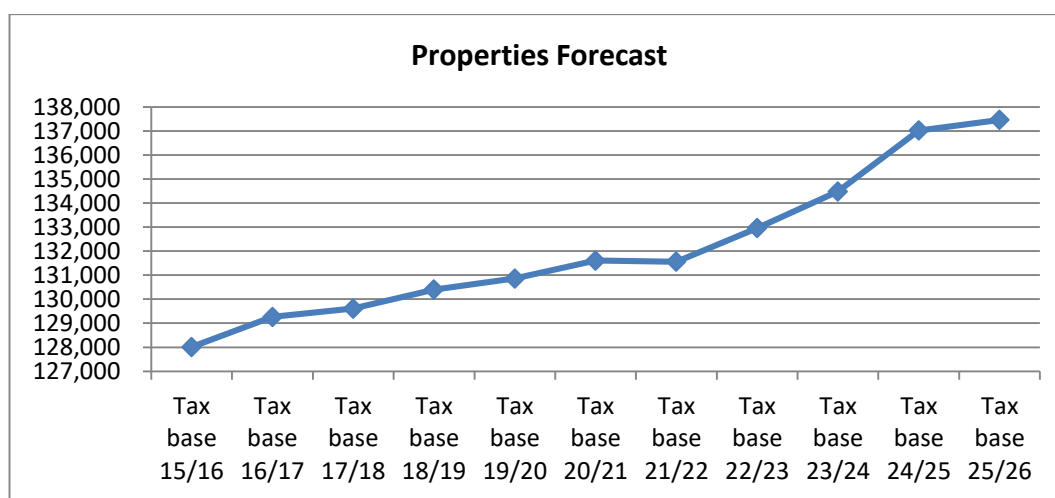
- 2.3 That Cabinet notes that no change to the Council Tax Reduction scheme is proposed for 2025/26 except that, in accordance with the policy agreed by full Council on 3 February 2022, earnings bands will be uplifted to reflect government changes to the National Living Wage as set out in paragraph 3.7.
- 2.4 That Cabinet agrees that in accordance with the Local Authorities (Calculation of Tax Base) (England) Regulations 2012, the amounts calculated by Brighton & Hove City Council as its council tax base for the year 2025/26 shall be as follows:-
 - 2.3.1 Brighton and Hove in whole – 95,160.3 (detail in appendix 1).
 - 2.3.2 Royal Crescent Enclosure Committee – 29.5 (detail in appendix 2).
 - 2.3.3 Hanover Crescent Enclosure Committee – 39.9 (detail in appendix 2).
 - 2.3.4 Marine Square Enclosure Committee – 72.2 (detail in appendix 2).
 - 2.3.5 Parish of Rottingdean – 1,785.8 (detail in appendix 2).
- 2.5 That Cabinet agrees that for the purposes of Section 35(1) of the Local Government Finance Act 1992, the expenses of meeting the special levies issued to the council by the Enclosure Committees shall be its special expenses.
- 2.6 That Cabinet agrees that the Enclosure Committees and Rottingdean Parish are paid the required Council Tax Reduction Grant of c£4,000 in total, to ensure they are no better or no worse off because of the introduction of the Council Tax Reduction Scheme for the reasons set out in paragraph 3.14.
- 2.7 That Cabinet notes that the amount forecast to be received by the council in 2025/26 from its share of local business rates and section 31 Local Government Act 2003 compensation grants is £86.520m, based on the latest available data.
- 2.8 That Cabinet notes that the amount forecast to be received by the council in 2025/26 from its share of local Council Tax, including Adult Social Care precepts, is £197.623m based on latest available data.
- 2.9 That Cabinet delegates the agreement of the final business rates forecast and completion of the NNDR1 2025/26 form to the Section 151 Chief Financial Officer following consultation with the Cabinet Member for Finance & City Regeneration and this will be reflected in the General Fund Budget report to Cabinet in February 2025.

3. Context and background information

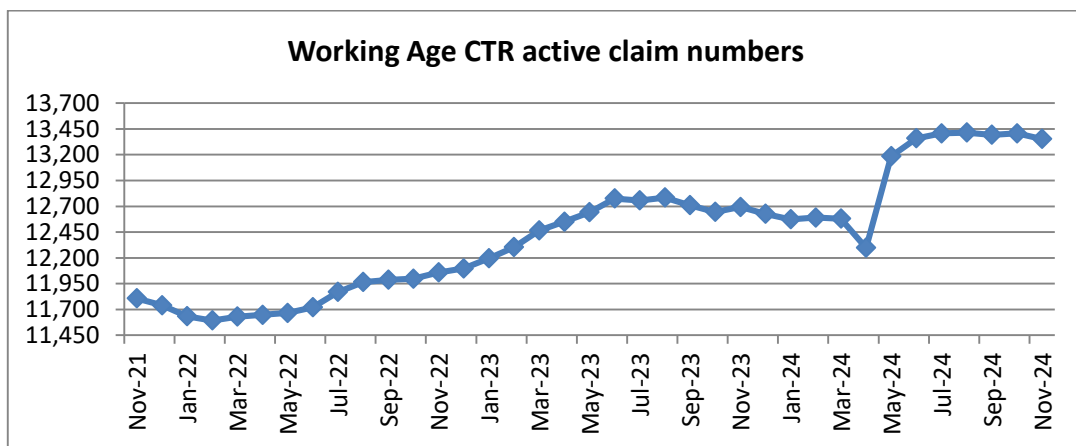
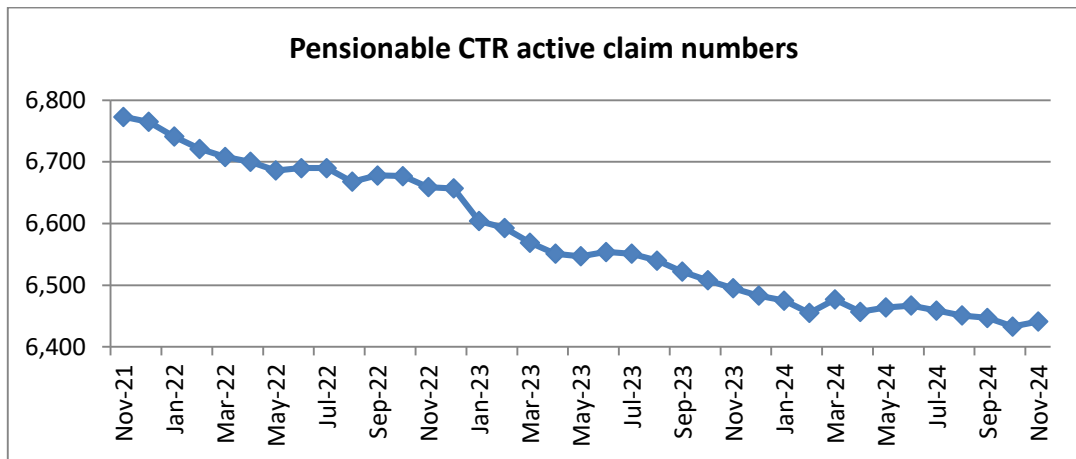
Council Tax

- 3.1 The tax base has been calculated in accordance with the Local Authority (Calculation of Council Tax Base) (England) Regulations 2012. The detail of the calculation for the whole of Brighton and Hove is shown at Appendix 1.
- 3.2 The tax base is calculated by estimating how many properties there will be in each tax band, determining what relevant discounts and exemptions apply, and how much council tax should ultimately be collected based on an expected collection rate.

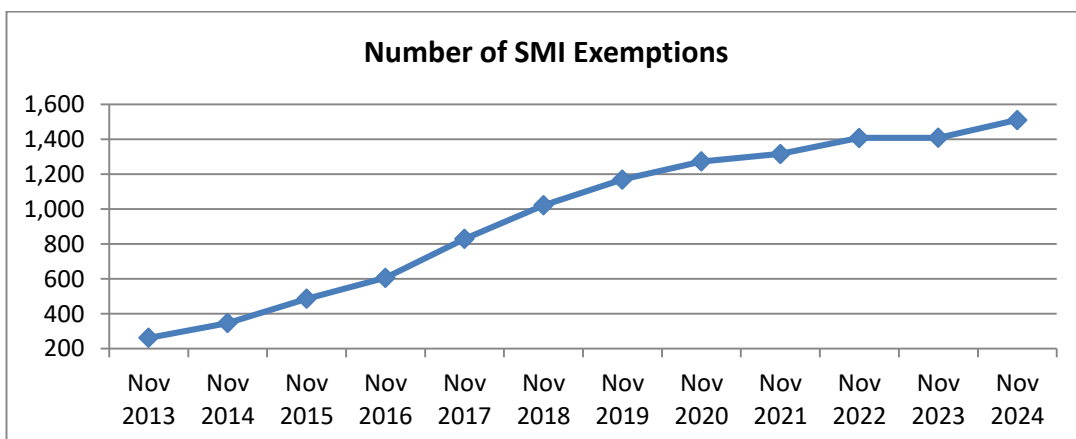
- 3.3 The key changes to the proposed tax base for 2025/26 are set out below.
- 3.4 As of November 2024, there were 135,990 properties on the valuation list. It is forecast that 1,466 new properties will be added by March 2026 equivalent to a 1.1% increase in the housing stock of the city. The largest developments within this include Sackville Trading Estate, Preston Road, Davigdor Road, Newtown Road, Saunders Park View, Coombe Farm and Lyon Close. In addition, there are student accommodation developments forecast to be added to the list by 31 March 2026, however their valuation is not straightforward and they will be exempt from council tax; they have therefore been excluded from the estimates. The graph below shows the trend of properties over time.



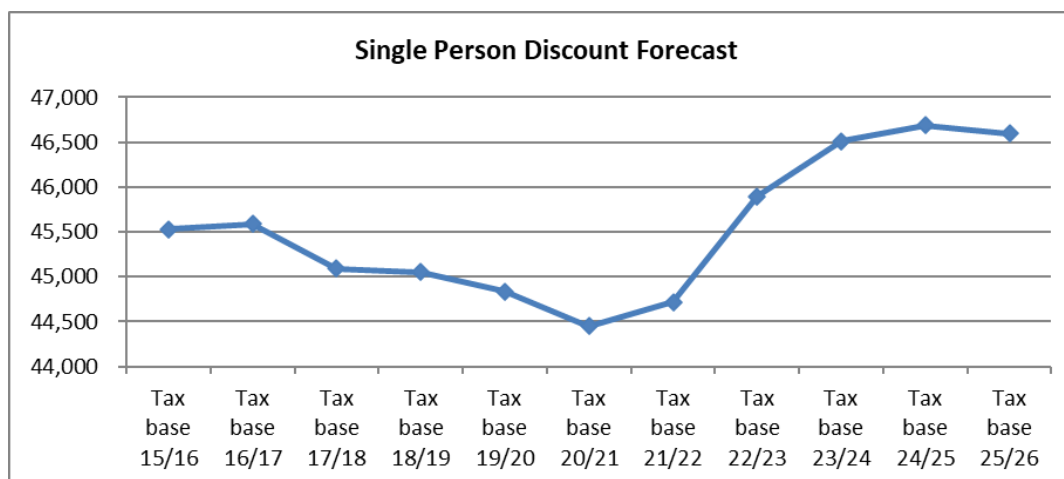
- 3.5 It is estimated that an average of 7,200 properties will be solely occupied by students (including halls of residence) during 2025/26.
- 3.6 The overall number of working age claimants receiving CTR has plateaued in recent months. Within this a greater proportion of claimants now receive universal credit and the average entitlement is reducing overall. The pensionable claimants receiving CTR have been decreasing through 2024/25 but have seen a small increase in November 2024. The tax base forecast assumes working age and pensionable claimants will remain at current levels. The overall number of CTR claimants is c19,800 at present and the cost of this support to the council in 2025/26 is estimated to be £20.168m.
- 3.7 The current Council Tax Reduction Scheme (CTR) was approved by full Council in February 2022. No changes were made to the scheme, but the Council approved the uplifting of earnings band thresholds in line with the changes to the National Living Wage announced by government. Similarly, no changes are proposed for the 2025/26 CTR scheme but the earnings bands will be uplifted as per the full Council's earlier decision. Therefore, there is no requirement to consult on the scheme.



- 3.8 The number of exemptions for Severely Mentally Impaired (SMI) eligibility whilst appearing to have levelled off by November 2023 has seen a further increase of 102 in the last year.



- 3.9 The proposed tax base for 2025/26 estimates the number of single person discounts (SPDs) to be 46,595.



- 3.10 The empty property premium charges are estimated to raise a similar amount to the current financial year amounting to £1.649m. The table below shows the November 2024 split across the different percentage bands.

Chargeable % for empty property premium	Number
100% on empty for over 1 year, up to 5 years	872
200% on empty for over 5 years, up to 10 years	54
300% on empty for over 10 years	8
Total empty property premiums	934

- 3.11 From 1 April 2025 the council is implementing a 100% second home premium charge, previously agreed by full council on 1 February 2024. There are allowable exceptions to the premium and with potential behavioural changes it is anticipated for the purpose of the tax base that 60% of the current second homes will attract the additional premium charge. This change represents an increase to the tax base of which the council's share is anticipated to be £1.642m and is included in this tax base projection.
- 3.12 The resultant tax base proposed for 2025/26 is 95,160.3 which is a 1.7% increase from the 2024/25 tax base of 93,574.4 for the reasons explained above and summarised in the table below.

Element	Tax base
2024/25 tax base	93,574.4
New properties and band changes	690.4
Second Home Premium	781.1
Increase to Empty Property Premium	194.0
CTR claimants	-273.3
Net change in exemptions	118.5
Net change in discounts	75.1
2025/26 tax base	95,160.3

- 3.13 The regulations require a separate calculation for parts of a local authority area where special expenses apply. Appendix 2 show the summary calculation for Enclosure Committees in Brighton and Hove which fall under

this category. Each Enclosure Committee sets a levy for maintaining the enclosure gardens, which is recovered through an additional council tax charge to the enclosure residents. Appendix 2 also shows the summary calculation for the Parish of Rottingdean.

- 3.14 The additional discounts generated by the council tax reduction scheme also have implications for the Enclosure Committees and Rottingdean Parish. In line with government guidance and what is considered fair to local residents it is proposed that the relevant proportion of council tax reduction grant is paid to each body to ensure they are no better or no worse off as a result of the local scheme. It is estimated the total grant payable in 2025/26 will be c£4,000 in line with previous years; the actual figure will depend on the tax level set by each body.

Business Rates Retention

- 3.15 The government announced in the Autumn Budget that the small business multiplier is to be frozen for a further year and will remain at 49.9p whereas the standard multiplier is increasing in line with CPI to 55.5p per £1 rateable value. The government compensates local authorities for the lost income due to the freezing of multipliers through S31 compensation grants.
- 3.16 The Autumn Budget announced that the retail, hospitality and leisure relief scheme will be extended for one year for 2025/26 with the same eligibility but with a reduced level of relief at 40%, and up to a cash cap of £110,000 per business.
- 3.17 The entries for the NNDR1 return are still being reviewed as there is added complexity with the decoupled multipliers and rating appeals. The latest working forecast is that the net share of local business rates and section 31 Local Government Act 2003 compensation grants is £86.520m. Any amendment to this forecast will be included in the February budget report to Cabinet.

4. Analysis and consideration of alternative options

- 4.1 The calculation of the council tax base is determined largely by regulation and is based on the latest available information. The completion of the NNDR1 form is prescribed in the completion guidance notes from MHCLG.

5. Community engagement and consultation

- 5.1 There are meetings between Finance and Revenues teams to discuss and review collection performance, movements in the tax base and the projections used for determining the tax base for the following year.
- 5.2 The Police & Crime Commissioner for Sussex and the East Sussex Fire Authority have been informed of the latest tax base projections as it forms part of setting their council tax precept.
- 5.3 The council has a duty to consult representatives of business ratepayers on the council's overall budget and this consultation will take place before February Cabinet.

6. Financial implications

- 6.1 The proposed tax base is estimated to generate £197.623m in 2025/26 based on a 4.99% council tax increase (including 2% adult social care precept). This sum will be reflected in the 2025/26 budget proposals to be presented to Cabinet and Budget Council in February 2025.
- 6.2 The assumed level of income through the Business Rates Retention scheme is £86.520m, an increase of £1.610m compared with 2024/25.
- 6.3 Any changes made to the final NNDR1 form including the council's share of any business rates collection fund deficit or surplus will be included within the budget forecast for 2025/26 and reported to Cabinet and Budget Council in February 2025.
- 6.4 Overall the tax base estimates contained within this report generate £0.448m additional income compared to the assumptions presented to Cabinet on 26 September 2024.

Finance officer consulted: Haley Woollard Date consulted: 07/01/25

7. Legal implications

- 7.1 Under the Local Government Finance Act 1992, the council must determine the Council Tax base applicable to Brighton & Hove. In respect of 2025/26, the base must be determined before 31 January 2025 as required by regulation 8 of The Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.
- 7.2 All other references to the legal framework for setting the council tax base are contained within the body of the report.
- 7.3 Under Part 2 of the Non-Domestic Rating (Rates Retention) Regulations 2013 (SI 2013/452), the council must determine specified information relating to its business rates forecast and notify the Secretary of State and relevant precepting authorities of the amounts. In respect of the year commencing 1 April 2025, these amounts must be determined by 31 January 2025.
- 7.4 The calculation of the Council Tax Base and Business Rates Retention Forecasts are not functions reserved to full Council by legislation or by local agreement and, as such, it is a matter to be determined by the Cabinet.

Lawyer consulted: Elizabeth Culbert Date consulted: 08/01/25

8. Equalities implications

- 8.1 There are no equalities impacts as a result of agreeing the council tax and Business Rates Retention base.

9. Sustainability implications

9.1 None.

10. Conclusion

- 10.1 It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the Council Tax in 2025/26 before 31 January 2025 and this report enables the Council to fulfil that requirement.
- 10.2 The council has a statutory duty to agree a business rates forecast for 2025/26, set out a forecast surplus or deficit for 2024/25 and submit an NNDR1 form by the 31 January 2025.

Supporting Documentation

1. Appendices

1. Tax base calculation for the whole of Brighton and Hove
2. Tax base calculation for enclosure committees and the parish of Rottingdean

Area:-

Brighton and Hove (Whole)

Appendix 1

Band: Range (£'k):	A entitled to disabled relief reduction	A <40	B 40-52	C 52-68	D 68-88	E 88-120	F 120-160	G 160-320	H >320	Total
1. Number of dwellings on list	0	30,085	30,471	35,404	20,461	11,695	4,825	2,830	219	135,990
2. Estimate of number of dwellings not listed *	0	222	213	334	151	79	6	7	3	1,015
3. Estimate of number of dwellings listed which will not be in band	0	(19)	(61)	(129)	(113)	(79)	(31)	(30)	(9)	(471)
4. Estimated exempt dwellings	0	(3,411)	(1,630)	(3,172)	(1,131)	(302)	(102)	(55)	(13)	(9,816)
5. Disabled relief dwellings from band above	19	61	129	113	79	31	30	9	0	471
6. Number of chargeable dwellings (sum lines 1 - 5)	19	26,938	29,122	32,550	19,447	11,424	4,728	2,761	200	127,189
7. Single person discounts (25%)	(12)	(15,611)	(12,241)	(9,941)	(4,934)	(2,519)	(906)	(412)	(19)	(46,595)
8. All residents disregarded (50%)	0	(31)	(82)	(113)	(49)	(38)	(34)	(38)	(25)	(410)
9. All but one resident disregarded (25%)	0	(388)	(472)	(459)	(238)	(110)	(34)	(15)	(1)	(1,717)
10. Second Home Job Related (50%)	0	(2)	(1)	(1)	(2)	(1)	(2)	0	0	(9)
11. Empty Property Premium 100%	0	230	215	159	109	48	18	15	2	796
12. Empty Property Premium 200%	0	18	17	13	2	1	0	1	2	54
13. Empty Property Premium 300%	0	3	3	2	0	0	0	0	0	8
14. Second Home Premium 100%	0	158	177	158	146	118	42	28	5	832
15. Council Tax Reduction (CTR)	0	(4,893)	(3,753)	(2,686)	(753)	(227)	(57)	(19)	0	(12,388)
16. Total number of appropriate percentage discounts	(3.00)	(8,476.25)	(6,537.75)	(4,994.00)	(1,812.50)	(735.75)	(250.00)	(99.75)	(6.50)	(22,915.50)
17. Aggregate of Lines 6+16	16.00	18,461.75	22,584.25	27,556.00	17,634.50	10,688.25	4,478.00	2,661.25	193.50	104,273.50
18. Ratio to Band D	0.5556	0.6667	0.7778	0.8889	1.0000	1.2222	1.4444	1.6667	2.0000	
19. Relevant Amount (Line 17 x Line 18)	8.90	12,307.80	17,565.50	24,494.20	17,634.50	13,063.40	6,468.20	4,435.40	387.00	
Aggregate of Relevant Amounts										96,364.90
Collection Rate										98.75%
ESTIMATED TAXBASE 2025/26										95,160.30

May contain minor rounding adjustments

* This reflects the part year effect of 907 dwellings to be added during 2025/26

Aggregate of Relevant Amounts	96,364.90
Collection Rate	98.75%
ESTIMATED TAXBASE 2025/26	95,160.30

Tax base calculation for enclosure committees and the parish of Rottingdean

	Royal Crescent	Hanover Crescent	Marine Square	Rottingdean Parish
Number of dwellings on list	25	45	117	1,801
Number of chargeable dwellings	24	42	113	1,758
Total number of appropriate percentage discounts	(1.75)	(4.75)	(22.00)	(181.00)
Aggregate of chargeable dwellings and discounts	22.25	37.25	91.00	1,577.00
Aggregate of Relevant Amounts (Band D equivalent)	29.8	40.3	72.9	1,808.4
Collection Rate	99.00%	99.00%	99.00%	98.75%
TAXBASE	29.5	39.9	72.2	1,785.8

Brighton & Hove City Council

Cabinet

Agenda Item 138

Subject: Regional care cooperative DfE pathfinder

Date of meeting: Thursday, 23 January 2025

Report of: Cabinet Member for Children, Families, Youth Services
and for Ending Violence against Women and Girls

Contact Officer: Name: Corporate Director for Families, Children and
Wellbeing

Tel: 01273 295237

Email: deb.austin@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 This paper seeks Cabinet approval for Brighton & Hove City Council to continue its involvement in a Department for Education Pathfinder pilot of a Regional Care Cooperative (RCC), alongside 18 other Local Authorities in the South East.
- 1.2 The overarching purpose of the RCC is to increase the number and quality of care placements available for children in the region, to develop a regional view of sufficiency through data sharing and to shape the market to provide more appropriate placements locally, thus improving children's outcomes and experiences of care.
- 1.3 To achieve these outcomes a contribution of £250,000 is being sought over a three-year period 2025/26 – 2027/28
- 1.4 Involvement in a RCC aligns with the Council Plan 2023 – 2027. In particular, Outcome 3 A healthy city where people thrive – Keep children and young people safe and ensure no child or family is left behind.

2. Recommendations

- 2.1 Cabinet agrees for Brighton & Hove City Council to continue to be involved in the RCC.

- 2.2 Cabinet agrees for a contribution of £250,000 to be made from to the RCC, with £50,000 being made in 25/26; £100,000 in 26/27 and £100,000 in 27/28. An outline business case has been completed as part of the corporate budget setting process for 2025/26 to access modernisation funding for this purpose.
- 2.3 Cabinet delegates authority to the Corporate Director, Families, Children & Wellbeing in consultation with the Cabinet Member for Children, Families, Youth Services and for Ending Violence Against Women and Girls to agree the RCC delivery model.

3. Context and background information

- 3.1 In early 2024, the South East's bid was selected as one of the two pathfinder areas for the Department for Education's (DfE) Regional Care Cooperative programme. Brighton & Hove City continues to support the initiative in principle, recognising the benefits that it will bring to our Children in Care. Brighton & Hove City Council is able to continue to influence the development of the RCC through representation at the project board.
- 3.2 The current system for delivering children's social care is not functioning effectively, with many Local Authorities' experiencing heavy year-on-year increases in the cost of delivering services.
- 3.3 The RCC's strategic priorities are to:
- Carry out regional data analysis and future sufficiency forecasting.
 - Improve Local Authorities' ability to access care places for children and young people across the region at better value for money.
 - Influence the market to ensure South East provision is available and better meets the needs of South East children and young people.
 - Commission care places for those with the most complex lives.
 - Develop a high-quality workforce to care for children and young people.
- 3.3 The RCC is an opportunity to work regionally to bring down the escalating costs of care placements while delivering better outcomes for children and young people. The DfE has provided funding of £1.95m for the setup of the South East RCC (running from April 2024 to June 2025) and £5m for the creation of new regional residential/foster provision through a capital grant.
- 3.4 BHCC has benefited from the capital grant through an award of £521,000 which has supported the development of the specialist residential home Rainbow Lodge.
- 3.5 Between 2015/16 and 2021/22, the amount spent on children's residential care increased by 66.2% in real terms nationally. Without the ability to shape the market that an RCC provides, Local Authorities will continue to face

rising costs and insufficient placements, leading to poorer outcomes for children and young people.

- 3.6 As at November 2024 there are 74 children placed in independent residential and foster care placements who would meet the criteria the RCC are focusing on. The average weekly spend is between £1,015 - £7,372 depending on the complexity of need of the child. There are currently 47 on-going searches for placements.
- 3.7 Beyond the setup costs covered by the DfE, the RCC can only function if funded by annual contribution from all 18 Local Authority members. The proposal is for a 50% contribution in year 1, moving to a 100% contribution in years 2 and 3.
- For BHCC this equates to:
- | | |
|------------------|----------|
| Year 1 (2025-26) | £50,000 |
| Year 2 (2026-27) | £100,000 |
| Year 3 (2027-28) | £100,000 |
- 3.8 A decision on the delivery vehicle for the RCC will be formalised in early 2025. Consideration is being given to the RCC being hosted by one of the 18 Local Authorities or for it be established as a Community Interest Company. Legal advice on behalf of the 18 Local Authorities is being sought.
- 3.9 In November 2024 the government published its strategy for the reform of children's social care – Keeping Children Safe, Helping Families Thrive. This document references the RCC pilot and the plan to legislate for all Local Authorities to be part of a RCC going forward.
- 3.10 In December 2024 the government introduced the first reading of the Children's Wellbeing and Schools Bill which sets out a direction for local authorities to form "regional co-operation arrangements" to discharge their strategic accommodation functions, which includes commissioning the provision of accommodation for children in care.

4. Analysis and consideration of alternative options

- 4.1 The council could make the decision to withdraw from the RCC pilot – this would necessitate returning the £521,000 capital grant for the development of Rainbow Lodge. Withdrawal from the pilot would also mean Brighton & Hove would need to commission placements outside the RCC with a significantly reduced ability to shape the market, thereby resulting in increased costs and poorer placement choice.
- 4.2 The government's strategy and resultant legislation to reform children's social care is clear that RCCs will be the delivery model for commissioning and securing children's placements going forward. If Brighton & Hove were to withdraw from the RCC pilot now, it is highly likely we would need to join a

RCC at a future point under the new legislation. We would then however have missed out on the opportunity to shape a system that maximises the benefits for the children and young people of the city.

5. Community engagement and consultation

5.1 No specific community engagement has been conducted at this stage as we are seeking an improvement in ways of working, cost efficiencies and most importantly improved outcomes for children.

5.2 As we move forward with the RCC development we will continue to work with our strategic partner PaCC and our Children in Care Council and Care Leavers forum to inform decisions and service delivery.

6. Financial implications

6.1 Capital funding

BHCC have accepted Capital Funding of £521,000 from DfE as part of the RCC bid to support the establishment of Rainbow Lodge. Rainbow Lodge is a new residential home for children and young people with complex needs and disabilities due to open March 2025. It is anticipated that we will be able to bring at least four of our children, currently placed out of the City, into Ireland Lodge thereby improving their outcomes and offering a financial saving for BHCC in the region £700,000.

If a decision is made not to join the RCC then it would be necessary to return the investment and would put the saving proposal at risk .

6.2 The effect of the proposal:

- bringing children and young people back into B&H to Rainbow Lodge with an estimated saving of £700,000

Name of finance officer consulted: Steve Williams

Date consulted :10/01/25

7. Legal implications

7.1 Legal advice is currently being sought by one of the LA's in the Pathfinder, on behalf of all involved LAs, regarding the setting up of the RCC as a social enterprise. Further information will be provided when the full design of the RCC has been agreed. This will provide further detail of the agreements reached and any legal implications.

7.2 Further legal advice will be provided in relation to any subsequent contractual activity in developing the pilot projects.

Name of lawyer consulted: Natasha Watson

Date consulted:14.01.25

8. Equalities implications

- 8.1 There is no group which is adversely affected by the council's continued involvement in, or contribution to, the RCC. The anticipated outcomes are only positive for children and young people with a closer scrutiny on their placements and better value for money enabling more services in the future.

9. Sustainability implications

- 9.1 No specifics in relation to this report.

10. Health and Wellbeing Implications:

- 10.1 Through our inclusion in the RCC it is anticipated that the outcomes for children and young people who are in care or require a specialist placement will be improved. Providers will be held to account on positive outcomes for our young people such as working in a trauma informed way, supporting a positive mental health approach and developing independence and employment skills.

Other Implications

11. Procurement implications

- 11.1 The RCC is intending to develop strong provider relationships, meaning that the RCC can work hand in hand with providers to create a stable placement landscape which is beneficial to all parties. New entrants who do not rely on a venture capital backed business model will be encouraged into the market.
- 11.2 These benefits will be achieved by working with providers to ensure provision better meets children's needs, improving the quality and size of the workforce, and collating, analysing and sharing regional data to ensure that decisions are evidence-based.
- 11.3 Costs will be reduced by commissioning placements regionally for those with the most complex lives, using data to improve transparency over provider pricing, improving relationships with providers, and enabling Local Authorities to commission collaboratively where appropriate. High-cost, complex placements are a particular focus.
- 11.4 Specific impact on procurement for individual Local Authorities is not known.

12. Crime & disorder implications:

- 12.1 Not applicable at this time.

13. Conclusion

- 13.1 Individual Local Authorities have a very limited ability to influence and change the way the care placement market operates. Working with 18 other Local Authorities will give the scale and volume to make significant changes.

- 13.2 By being part of the South East RCC pilot, Brighton & Hove City Council have already benefited from £521,000 capital funding to develop Rainbow Lodge – a residential provision in the city for children with complex needs. It is likely we will continue to benefit from being part of a regional cooperative that has the ability, through its size and purchasing power, to shape the market to provide placements that our children need.
- 13.3 Central government has indicated its intention for every Local Authority to be part of a RCC going forward as set out in Keeping Children Safe, Helping Families Thrive strategy and the Children's Wellbeing and Schools Bill.

Supporting Documentation

Appendices

None

1. Background documents

None

Brighton & Hove City Council

Cabinet

Agenda Item 139

Subject: Preventing and tackling violence against women and girls, domestic abuse, and sexual violence – Brighton & Hove City Council's strategy 2025-2028

Date of meeting: 23rd January 2025

Report of: Cabinet Member for Children, Families, Youth Services and for Ending Violence against Women and Girls

Contact Officer: Name: Anne Clark, Strategic Lead Commissioner, Domestic Abuse, Sexual Violence and Violence Against Women and Girls
Email: anne.clark@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: It is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards)

For general release

1. Purpose of the report and policy context

- 1.1 Violence against Women and Girls, Domestic Abuse and Sexual Violence (VAWG/DA/SV) is one of the most significant crimes in Brighton & Hove that harms many of our residents every year.
- 1.2 This report sets out how the Council will support its mission to create a better Brighton and Hove for all, achieving a fair and inclusive city where people feel safe and welcome by delivering this strategy and action plan to prevent and tackle VAWG/DA/SV.
- 1.3 Following feedback from the Equality, Community Safety and Human Rights Committee in October 2023, a series of consultations with the public and key stakeholders have informed the strategy

2. Recommendations

- 2.1 Cabinet approves the Preventing and Tackling Violence against Women and Girls, Domestic Abuse and Sexual Violence strategy 2025-2028 in appendix 1.

- 2.2 Cabinet agrees the implementation of the 3 year delivery plan set out in appendix 2.
- 2.3 Cabinet agrees to the setting up of a new VAWG/DA/SV Oversight Board to report into the Community Safety Partnership to ensure effective implementation, accountability and alignment with strategic objectives.

3. Context and background information

- 3.1 Violence Against Women and Girls (VAWG) is the umbrella term used to describe a range of abusive and violent behaviours and acts, which are predominantly, but not exclusively, experienced by women and girls. This term and its definition adopted by the United Nations is used to describe the forms of abuse against all genders but acknowledges the disproportionate impact of abuse and violence on women and girls.
- 3.2 The Council recognises that VAWG/DA/SV affects all sectors of the community regardless of age, gender, race, disability, or sex. It includes but is not limited to:
- Domestic abuse
 - Sexual violence/rape
 - Sexual Harassment
 - Sexual exploitation
 - Stalking
 - Crimes committed in the name of “honour”
 - Forced marriage
 - Female genital mutilation/cutting
 - Faith based abuse
 - Violence against women in public spaces
 - Forced Prostitution and human trafficking
 - Digitally enabled Abuse
 - Economic Abuse
- 3.3 The current (2024) UK government has identified the prevalence of VAWG/DA/SV as a national threat. The Governments mission is to “reduce such violence by 50% (VAWG) within the next decade”.
- 3.4 VAWG/DA/SV is high in Brighton and Hove with domestic abuse making up 11% of all recorded crime in Brighton & Hove for 2023/2024. Police reports show that there were there 1,209 sexual offences, with which 1,009 of these incidents were classified as serious sexual offences. In addition, there were 460 stalking incidents reported to the Police in Brighton & Hove in 2023/2024.
- 3.5 The attached strategy is built around four key strategic priorities that guide our approach to addressing VAWG, DA and SV, these are below:

- **Strengthening the co-ordinated response** to all forms of VAWG, DA and SV irrespective of whether the incident occurs in private or public space, we will join up council and partner services and address gaps in provision.
- **Prioritising prevention** to end VAWG, DA and SV through a collaborative approach to awareness raising, data and information sharing, education and communication campaigns.
- **Supporting survivors** to ensure anyone affected by VAWG, DA and SV has access to high quality trauma-informed support. Working across public, private and third sector partners, with specialist and community providers, we will identify and support victims at an earlier stage.
- **Building an accountable community and changing perpetrator behaviour** by shifting the focus away from the victim's behaviour to the perpetrator's, strengthening the criminal justice response and supporting behaviour change.

3.6 To ensure a clear and targeted delivery, we have also developed an action plan directly under each strategic priority. For each priority, we have outlined a specific action to be taken and its intended outcome. This structure allows partners and stakeholders to clearly understand the desired impact of each action, supporting a coordinated effort toward achieving our overarching goals. The full list of actions can be found in appendix 2.

3.7 To ensure effective implementation, accountability and alignment with strategic objectives, a structured governance model will guide the delivery and tracking of actions. The new VAWG/DA/SV Oversight Board will report to the Community Safety Partnership (CSP), the board will monitor actions, address emerging challenges, and adjust our response as needed (see Appendix 4 for Oversight Board draft terms of reference – these will be further developed with partners as part of setting up the Board). The Board will include representatives from other senior Boards including the Adult Safeguarding Board, Children's Safeguarding Board, Community Safety Partnership Board and Health and Wellbeing Board. The Board will report directly to the Community Safety Partnership Board and report to the other senior Boards as required and align with the Cabinet.

4. **Analysis and consideration of alternative options**

4.1 One option was not to develop a new strategy and action plan, and to continue the reactive responses to VAWG. However, doing so would inhibit a pro-active approach and long-term planning, and would ignore the rapidly changing threat that is VAWG in the city.

5. **Community engagement and consultation**

5.1 The development of the strategic aims and this strategy was informed by a review of key documents, including national guidance to support victims and survivors of VAWG, DA and SV existing council strategies and engagement events between November 2023 and September 2024.

5.2 The council carried out a public consultation on the strategic aims. 233

responses were received to the public survey on a draft strategy. Of these, 60 people (23%) identified as survivors of VAWG, 41 respondents identified themselves as voluntary or third sector organization's and 31 as public sector. The feedback demonstrated strong support for our four key priorities:

- A strengthened Coordinated Response: 75% of respondents strongly agreed, and 19% agreed.
- Prioritising Prevention: 79% strongly agreed, and 14% agreed.
- Support for Survivors: 88% strongly agreed, and 7% agreed.
- Building an Accountable Community and Changing Perpetrator Behaviour: 79% strongly agreed, and 13% agreed.

5.3 Alongside the public consultation, we also organised workshops with local stakeholders and community members to discuss the four strategic priorities in detail, ensuring diverse perspectives were considered and securing active partner involvement.

- VAWG strategy consultation – A stronger coordinated community response (Thursday, December 7, 2023)
- VAWG strategy consultation- Prioritising Prevention (Tuesday, December 12, 2023)
- VAWG strategy consultation- Support for Survivors (Friday, December 15, 2023)
- VAWG strategy consultation- Accountable community and perpetrator behaviour (Wednesday, December 6, 2023)

5.4 To ensure a whole council approach to preventing and tackling VAWG/DA/SV, we brought together in September 2024 council officers from across directorates and services areas to run an engagement workshop to ensure a council wide alignment on VAWG/DA/SV actions and strategic priorities.

5.5 Alongside our internal and external engagement, we also took a robust approach to the reviewing of data, internal strategies, legislative frameworks, lessons from safeguarding reviews, domestic homicide review reports, and analysis on national reports. To see a more in-depth outline and analysis of this please see the full strategy in appendix 1.

7. Financial implications

7.1 Any costs of the work needed to develop this strategy, including the creation of the Oversight Board structure and officer involvement with the board meetings 4 or 5 times a year will be met from within current budget resources for this service. The 2024/25 budget of £1.502m is partially funded from grant income of £0.631m, the remainder from permanent budget allocation. Although, prior year spend has increased year on year, from £0.425m in 2021/22 to £0.933m in 2023/24, it has always come within budget. Any significant variations will be reported as part of the Councils monthly budget monitoring process.

Name of finance officer consulted: Michael Bentley Date consulted
06/01/2025

8. Legal implications

- 8.1 The Council has duties under a wide range of legislation and statutory guidance to safeguard and to work together with other agencies and to support victims of violence and domestic abuse.
- 8.2 The Domestic Abuse Act 2021 in particular sets out a range of measures to prevent domestic abuse and protect all victims. It imposes legal duties on local authorities to assess, strategise, and provide accommodation-based support for victims of domestic abuse, while also ensuring cooperation with other organisations to enhance the support system for victims.
- 8.3 Amongst other things, the Act requires local authorities to report annually to Government on its work in this area and to develop and publish the Strategy appended to this Report. Taking the actions outlined in this Report will assist the Council in meeting its responsibilities in this area.

Name of lawyer consulted: Victoria Simpson Date consulted 14/01/25

9. Equalities implications

- 9.1 The cabinet report highlights considerations informed by this EIA. These are summarised below:

Public consultations revealed significant safety concerns, due to sexual harassment, particularly at night, and the need for improved support and respect for dignity for those with lived experiences of VAWG, alongside a balanced provision of services to meet the needs of a diverse city like Brighton. The EIA highlights the need for a co-ordinated community response to VAWG, DA, and SV, with the support of key statutory partners with a focus on prevention, support for survivors, and accountability for perpetrators.

It is important to address funding reduction implications for those impacted, particularly for joint commissioning, and recognise the disproportionate impact on women and girls, alongside gender normativity, inequality and intersectional impacts. Intersectional considerations and an inclusive approach are important so that we do not minimise how VAWG, DV ad SV have an additional impact on top of age and gender when there are additional layers of impact being disabled, from a migrant or socio-economically vulnerable, Black and non-White-presenting Minoritised Ethnic background, and LGBTQIA+, especially Trans, Non-Binary, and Intersex people. The strategy and EIA outline several recommendations and mitigating actions, including various statistics and layers of impacts for the cabinet to consider in provision of services

- 9.2 A full Equality Impact Assessment has been undertaken and is attached in appendix 3.

10. Sustainability implications

10.1 None identified.

11. Health and Wellbeing Implications:

Social Value and procurement implications

11.1 Social Value considerations will be part of all future commissioning for VAWG, Domestic Abuse and Sexual Violence services commissioned by the Council.

Crime & disorder implications:

11.2 Violence Against Women and Girls, Domestic Abuse and Sexual Violence are serious violent crimes, and this strategy directly aligns with the Councils Community Safety and Crime Reduction Strategy 2023-2026

Public health implications:

11.3 VAWG is a major health issue and features in UK Health Security Agencies work to reduce harm across the wider detriments of health and address wider system issues such as homelessness, parenting, poverty, education and unemployment, www.ukhsa.gov.uk. The link between VAWG and suicide has now been recognized with the inclusion of suicide in Domestic Abuse Related Death Reviews (DARDR) formerly known as Domestic Homicide Reviews (DHR). The strategy aligns with these workstreams and we will continue to work with Health to address health inequalities linked to Violence Against Women and Girls, Domestic Abuse and Sexual Violence

12. Crime & disorder implications:

12.1 The strategic direction document has been written to enable the Community Safety Partnership to meet the strategic aims set out within the Community Safety Strategy 2023-2026.

13. Conclusion

13.1 Throughout the journey of developing this report, we have developed four key priorities with the recommendation of focusing on: A strengthened coordinated response, prioritising prevention, supporting survivors, and building an accountable community and changing perpetrator behaviour. These priorities will guide our action plan and will be accountable to our newly developed VAWG/DA/SV oversight board.

13.2 The recommendations set out in this report will not have all the answers to the endemic issues of VAWG/DA/SV. However, the priorities developed and supported by residents set out a set of ideas, that if executed effectively, does have the potential to create a Brighton & Hove that is taking serious stand to prevent and tackle VAWG/DA/SV at home and on our streets.

- 13.3 We would also like to take this opportunity to thank all our stakeholders, residents and officers, who have shared their experience and expertise to develop this strategy. This report would not have been possible without this valuable contribution and time.

Supporting Documentation

1. Appendices

1. Brighton & Hove City Council's Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025-2028
2. Action plan as a stand-alone document, which is currently embedded as part of the strategy.
3. Full Equalities Assessment Impact Report.
4. Oversight Board ToRs

Brighton & Hove City Council: Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence

Strategy and Action Plan for the years 2025-2028

Foreword

Violence against women and girls, domestic abuse and sexual violence (VAWGDA SV) is a national and local priority, a criminal justice issue, and a violation of human rights that impacts individuals and families and harms communities, societies and economies.

VAWG, DA and SV is a national priority, with the current (2024) Government stating: "This initiative is part of an ambitious, unprecedented mission to reduce such violence by 50% (VAWG) within the next decade."

However, the devastating impacts of VAWG, DA and SV are felt most acutely at the local level, within homes, workplaces, public spaces, and communities. We cannot, and will not, tolerate violence in any form.

There are four priorities laid out in this Strategy: prioritising prevention; support for survivors; Building an accountable community and changing perpetrator behaviour; and stronger coordinated response. These have been developed using data, intelligence and research, alongside consultation with stakeholders and, critically, with feedback from victims/survivors.

We cannot achieve these ambitious goals alone. This strategy calls for collaboration between statutory services, the community and voluntary sectors, local businesses, and residents. Together, we will build a city where VAWG, DA and SV is not tolerated.

Brighton & Hove is a city that values inclusion, equality, and safety. By working together to implement this strategy, we can ensure that these values are extended to every resident, creating a future where violence is prevented, survivors are supported, and perpetrators are held accountable.

Together, we can create a safer, more supportive Brighton & Hove, where everyone can live free from violence and fear.

Councillor Emma Daniel

Executive Summary:

Brighton & Hove City Council is dedicated to preventing and addressing Violence against women and girls (VAWG), Domestic Abuse (DA) and Sexual Violence (SV) through a comprehensive partnership led strategy. This strategy emphasizes the importance of collaboration across our community to support those affected and hold perpetrators accountable.

Vision and Mission:

Our vision is to create a safe and supportive environment for all individuals, free from violence and abuse. Our mission is to implement a coordinated and effective response to VAWG, DA, and SV, ensuring the safety and well-being of survivors while holding perpetrators accountable.

Key Objectives:

- 1) Strengthened Community Response
- 2) Prioritising Prevention
- 3) Supporting Survivors
- 4) Building and accountable community and changing perpetrator behaviour

These four themes recognise the different reasons for VAWG, DA and SV, the need to take action to prevent it, as well as to ensure the correct support is there for survivors.

Strategic Components

- Coordinated Community Response (CCR) Model: This model serves as the framework for reviewing our partnerships and ensuring a unified approach to addressing VAWG, DA, and SV (see page 21 to 23).
- Multi-Agency Risk Assessment Conference (MARAC): An actionable meeting that brings together key agencies to coordinate responses for high-risk individuals, ensuring comprehensive safety plans and support.
- VAWG, DA, and SV Oversight Board: Another actionable meeting that oversees the delivery of the action plan, monitors progress and addresses emerging challenges. The board ensures alignment with strategic goals and effective implementation of the strategy.

Stakeholder and partnerships

This strategy involves collaboration with local organisations, networks, and residents. Key stakeholders include the police, health services, housing, social care, and specialist VAWG, DA, and SV services. By working together, we aim to provide a robust and coordinated response to violence and abuse.

Action Plan:

The strategy will be implemented through a series of targeted actions and initiatives. Task and Finish Groups will address specific areas such as community coordination,

prevention, survivor support, and perpetrator behaviour change.

Monitoring and Evaluation

The newly created VAWG, DA, and SV Oversight Board will monitor the implementation of the strategy, ensuring that the accompanying action plan objectives are aligned with strategic goals and adjusting approaches as needed. Regular reviews and feedback from stakeholders will help maintain the effectiveness and responsiveness of the strategy.

Understanding Violence Against Women and Girls (VAWG), Domestic Abuse (DA) and Sexual Violence (SV):

Within the term VAWG, DA and SV a range of forms of violence are recognised. These include gender-based violence (GBV); intimate partner violence (IPV); domestic violence and abuse (DVA) sexual violence and abuse (SVA); coercive control; forced marriage; child marriage; so called honour-based abuse (HBA); female genital mutilation (FGM); human trafficking; sexual harassment; cyber harassment, and adolescent dating violence (ADV). Many of these terms are used as umbrella terms and are not mutually exclusive.

In defining VAWG, DA and SV, we at Brighton & Hove City Council use the United Nations' (UN) globally recognised definition:

“Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.”

This definition underscores the many forms of abuse and their contexts, emphasising that VAWG, DA and SV encompasses acts of violence within the home and across public spaces. Recognising VAWG, DA and SV as a multifaceted issue allows us to address it more effectively within Brighton & Hove, ensuring no form of harm is overlooked, and highlighting the city's commitment to reducing such violence.

Intersectionality

This strategy recognises that VAWG disproportionately impacts women and girls, it also acknowledges the intersecting factors of race, disability, sexual orientation, gender identity and immigration status which can heighten vulnerability. Brighton & Hove City Council is committed to ensuring that all services are inclusive, addressing the specific needs of individuals with intersecting identities and challenges.

Additionally, while within this strategy we understand that VAWG, DA and SV disproportionately impacts women and girls, it also acknowledges that boys and men, both as children and adults, are also affected by violence and abuse.

Equal access to rights and entitlements:

Experiences of violence and abuse and access to support, safety and justice, will be different for different groups of women and individuals. Their experiences will differ according to the factors which define their participation in society including background, work and access to resource among others. Whilst all women are affected by patriarchy, inequality and discrimination, some women will be affected disproportionately due to their race, ethnicity, sexuality, gender identity, disability, age, class, immigration status, caste, nationality,

indigeneity, linguistic minority, and faith.

An example of the need to understand how experiences differ is the work that the **Harmful a sexual behaviour group** a subgroup of the Children's Safeguarding Board has identified including consideration of the adultification and hyper-sexualisation of young black girls in schools. Adultification leads to unfair treatment and harsher disciplinary actions, while hyper-sexualisation results in stigmatisation and victim-blaming.

Our Approach

The Council is committed to tackling and preventing VAWG/DA/SV and will continue to work with partners to improve both its own response to VAWG/DA/SV and with its partners to improve the local coordinated response to VAWG/DA/SV.

Strategic Aims

Our primary aim is to support the reduction of VAWG, DA and SV incidents by 50% within the next decade, a target that aligns with the national agenda. We recognise that addressing VAWG, DA and SV is essential for achieving equality, justice, and a safe environment for everyone in Brighton & Hove.

Our strategy is built around four key strategic aims that guide our approach to addressing VAWG, DA and SV

1. **Strengthening the co-ordinated response** to all forms of VAWG, DA and SV irrespective of whether the incident occurs in private or public space, we will join up council and partner services and address gaps in provision.
2. **Prioritising prevention** to end VAWG, DA and SV through a collaborative approach to awareness raising, data and information sharing, education and communication campaigns.
3. **Supporting survivors** to ensure anyone affected by VAWG, DA and SV has access to high quality trauma-informed support. Working across public, private and third sector partners, with specialist and community providers, we will identify and support victims at an earlier stage.
4. **Building an accountable community and changing perpetrator behaviour** by shifting the focus away from the victim's behaviour to the perpetrator's, strengthening the criminal justice response and supporting behaviour change.

VAWG, DA and SV: A shared responsibility

This strategy is designed to address the deeply distressing and pervasive crimes encompassed by VAWG, DA and SV. In line with the National Statement of Expectations for VAWG services (2022)¹, our strategy aims to provide a collaborative, multi-agency approach to offer accessible support for victims and survivors, whilst holding perpetrators to account.

VAWG, DA and SV affects individuals of all genders, ages, and backgrounds, though it disproportionately impacts women and girls. Our approach acknowledges that while each

¹ [Violence against women and girls national statement of expectations \(accessible\) - GOV.UK](#)

crime type may differ in nature and context, a coordinated response involving the council, local partners, and community stakeholders is essential to support victims, raise awareness, and improve life outcomes. This strategy aligns with national priorities while tailoring our response to meet the unique needs of Brighton & Hove.

Partnership and Community Approach

A partnership-led approach is central to our VAWG, DA and SV strategy. This approach reflects our understanding that preventing and tackling violence and supporting those affected, requires a collaborative effort across our community. Brighton & Hove City Council works closely with local organisations, networks, and residents to build a robust and coordinated response to VAWG.

To support this approach, we are establishing the new VAWGDASV Oversight Board. The purpose of this board is to provide collaborative oversight, ensuring the effective progression and delivery of the VAWGDASV strategy and action plan. The Oversight Board will also align the scrutiny of performance with our strategic aims, ensuring that all actions are effectively monitored and evaluated.

MARAC (Multi Agency Risk Assessment Conference)

The Multi-Agency Risk Assessment Conference (MARAC) is a cornerstone of Brighton & Hove's partnership-led approach to tackling VAWG.

MARAC brings together key agencies, including the police, health services, housing, social care, and specialist VAWG, DA and SV services, to coordinate responses for individuals at the highest risk of domestic abuse. By sharing information and expertise, MARAC ensures a comprehensive and effective safety plan is developed for each case, reducing the risk of harm and enabling victims and their families to access the support they need.

MARAC exemplifies best practice in partnership working, with its collaborative approach serving as a national model for addressing domestic abuse. In Brighton & Hove, MARAC operates on a weekly basis to provide timely interventions for high-risk cases, directly contributing to the prevention of serious harm and saving lives. The conference demonstrates how a united response from multiple agencies can significantly reduce risks, strengthen community safety, and deliver tangible outcomes for victim-survivors.

The council's active role in MARAC highlights its commitment to fostering strong partnerships and prioritising the safety of those most vulnerable to VAWG, DA and SV. By continually reviewing MARAC processes and incorporating feedback from stakeholders, Brighton & Hove ensures that the initiative remains effective, innovative, and responsive to emerging challenges.

Table 1.

**1 Jan-31 Dec 2022 vs 1 Jan-31 Dec 2023
(From Safelives)**

	BH 2022	Sussex 2022	BH 2023	Sussex 2023
Number of MARACs	1	8	1	9
Number of meetings held	50	218	49	225
Number of cases discussed	759	3025 (25% BH)	828	3504 (24% BH)
Number of repeat cases	44.50%	33.00%	39.30%	33.50%
Number of children in households	896	3902 (23% BH)	836	4053 (21% BH)
Cases with children %	n/a	n/a	10.90%	9.90%
Recommended number of admin/s for MARAC cases	2	7.6	2.2	8.8



MARAC- Multi Agency Risk Assessment Conference (Jan – Dec 2022 vs Jan to Dec 2023)

Other key Partnership Activities

To ensure a comprehensive and effective approach, the council is actively involved in a range of local and Pan Sussex groups, boards, and initiatives that address various aspects of VAWG, DA and SV. These activities enable us to collaborate, share best practices, and implement coordinated actions.

Quarterly Activities:

- **Commissioning and Contract Monitoring:** Oversight of nine BHCC-commissioned services and one Pan Sussex service to ensure quality and alignment with strategic priorities.
- **Pan Sussex Boards and Groups:**
 - Domestic Abuse Board
 - Sexual Violence Board
 - Harmful Practice Group
 - Perpetrator Group
 - Victim and Witness Group
 - No Recourse to Public Funds Working Group
 - Domestic Abuse Related Death Reviews Group
 - Housing Reciprocal Task and Finish Group

- **Local Partnership Groups:**
 - Brighton & Hove Safeguarding Children Board (Learning and Development Group)
 - Brighton & Hove Safeguarding Adults Board (Learning and Development and Quality Assurance Groups)
 - Brighton & Hove Community Safety Partnership Board
 - MATAC (Multi Agency Tasking and Collaboration)
 - Harmful Sexual Behaviour Group
- **VAWG, DA and SV- Specific Activities:**
 - Facilitation of the VAWG, DA and SV Network for partnership collaboration
 - Coordination of Brighton & Hove Domestic Abuse Related Death Reviews
 - Development and delivery of VAWG, DA and SV training
 - Management of the BH Domestic Abuse Act Operational Housing Group
 - Management of the Multi-Agency Risk Assessment Conference (MARAC) Steering Group

Weekly Activities:

- **MARAC:** Weekly multi agency risk assessment conferences to develop support plans to decrease the risk of harm to high-risk victims of domestic abuse through multi-agency interventions.

Six-Monthly Activities:

- **No Recourse to Public Funds Network:** Collaborative discussions to address barriers and support for individuals affected by VAWG, DA and SV who have restricted access to public resources.

The Coordinated Community Response (CCR) Model

Brighton & Hove City Council is committed to an integrated, multi-agency Coordinated Community Response (CCR). This model unites services to ensure local systems keep survivors safe, hold abusers accountable, and prevent VAWG, DA and SV

No single agency is solely responsible for tackling and preventing VAWG, DA and SV. However, by collaborating with various agencies and communities, we can provide safe and effective responses to reduce harm.

VAWG, DA and SV is a complex social issue that affects individuals, communities, and services across our society, including health, housing, social care, and the Criminal Justice System. Agencies and organisations often address different aspects of the issue or approach the same problem from various angles.

These agencies also have their own, sometimes conflicting, processes, responsibilities, and measures of success. The CCR enables a holistic response to individuals, shifting the responsibility for safety from survivors to the community and services designed to support them. Every agency involved in dealing with survivors, their children, and/or perpetrators must work effectively within their own organization and in collaboration with other agencies to ensure the safety of survivors and their children and to hold perpetrators accountable.

Good Practice Example

The following case study highlights a practical example of how Brighton & Hove City Council is implementing the CCR model.

Case Study 1: Strengthening Partnerships through Quarterly VAWG, DA and SV Service Meetings and VAWG, DA and SV Network Events

Initiated following multi-agency feedback regular, in-person meetings among VAWG, DA and SV services in Brighton & Hove—both commissioned and non-commissioned—reflect the CCR model's emphasis on collaborative partnership. These quarterly meetings enable VAWG, DA and SV professionals across Brighton & Hove to share insights, address service gaps, and align on common challenges.

The VAWG Network provides a platform for professionals to learn more about different forms of VAWG often through an intersectional lens to upskill practitioners.

One Council Approach

Alongside the Coordinated Community Response, the council is committed to a One Council approach to tackling VAWG, DA and SV. This ensures that all council services and teams across the organisation play an active role in preventing and tackling VAWG, DA and SV. by embedding these as priorities across every service area within the council

Good Practise Example

The follow example highlights a practical example of how internally the council is working collaboratively with different departments to actively support domestic abuse survivors in housing services.

Case Study 2: Enhancing Support for Domestic Abuse Survivors in Housing Services

Brighton & Hove City Council has prioritised the voices of victim-survivors and stakeholders in shaping its response to the Domestic Abuse Act 2021, demonstrating a commitment to delivering services that are inclusive, effective, and survivor-centred.

Developing a Strategic Response

The Council contributed to the Pan Sussex Domestic Abuse Support in Safe Accommodation Strategy 2021–2024, which provided key recommendations to improve services for survivors. These recommendations guided the commissioning of a range of new services funded through the New Burdens allocation. (See Appendix 1)

Additionally, the Council commissioned Stonewater to produce the *Safehaven by the Sea* report, which involved extensive consultation with victim-survivors, stakeholders, and a review of national developments in domestic abuse and housing. Published in the summer of 2024, the report actionable recommendations that have directly informed service improvements. (See Appendix 1)

Improving Housing Pathways for Domestic Abuse Survivors

In line with the findings and the One Council Approach, Brighton & Hove City Council's Housing Management Services, in collaboration with the internal VAWG, DA and SV team, has undertaken a comprehensive review of its policies and procedures to align with the requirements of the Domestic Abuse Act.

A working group has been established to improve housing pathways for domestic abuse survivors. This group, led by the Homelessness and Housing Options teams, has introduced the role of Refuge Champions, staff members dedicated to ensuring smoother transitions from refuges to independent housing. Refuge Champions work closely with refuge staff, facilitating clear and accessible pathways for survivors ready to leave Brighton & Hove's refuges.

This initiative exemplifies the Council's commitment to improving coordination across services and enhancing survivors' experiences as they move toward independence. By prioritising collaborative approaches, the Council is making housing services more accessible and responsive to survivors needs.

Embedding Intersectional Support and Training

To further strengthen support, staff from **RISE** and **Switchboard** are now co-located with the Homelessness and Housing Options team, providing integrated and immediate expertise for those accessing services. Furthermore, the Council has partnered with **Stonewater**, **RISE**, **Switchboard**, and **Cranstoun** to deliver extensive training to housing staff. This training focuses on the intersectional nature of domestic abuse, equipping staff with skills and knowledge needed to support survivors from diverse backgrounds effectively.

By embedding these changes, Brighton & Hove City Council demonstrates its dedication to enhancing the safety and well-being of domestic abuse survivors and ensuring their journey to secure and independent housing is as supportive and seamless as possible.

That Causes Violence Against Women and Girls (VAWG), Domestic Abuse (DA) And Sexual Violence (SV)?

VAWG, DA and SV can be looked at through a “ecological framework” which is an evidence-based approach on the complex interplay of factors that contribute to VAWG.² This model shows how individual, relationship, community, and societal factors interact to influence the risk and experience of violence. By understanding these interconnected levels, we can take comprehensive actions at each level to support and reinforce efforts to prevent violence.

1. At the **individual level**, personal history and biological factors influence how individuals behave and increase their likelihood of becoming a victim or a perpetrator of violence. Among these factors are being a victim of child maltreatment, psychological or personality disorders, alcohol and/or substance abuse and a history of behaving aggressively or having experienced abuse.
2. Personal **relationships** such as family, friends, intimate partners and peers may influence the risks of becoming a victim or perpetrator of violence. For example, having violent friends may influence whether a young person engages in or becomes a victim of violence.
3. **Community** contexts in which social relationships occur, such as schools, neighbourhoods and workplaces, also influence violence. Risk factors here may include the level of unemployment, population density, mobility and the existence of a local drug or gun trade.
4. **Societal** factors influence whether violence is encouraged or inhibited. These include economic and social policies that maintain socioeconomic inequalities between people, the availability of weapons, and social and cultural norms such as those around male dominance over women, parental dominance over children and cultural norms that endorse violence as an acceptable method to resolve conflicts.

² [The Ecological Framework](#)

The Many Forms of Violence Against Women and Girls, Domestic Abuse and Sexual Violence

VAWG, DA and SV covers a range of unacceptable and deeply distressing crimes, including gender-based violence (GBV); intimate partner violence (IPV); domestic violence and abuse (DVA) sexual violence and abuse (SVA); coercive control; forced marriage; child marriage; so called honour-based abuse (HBA); female genital mutilation (FGM); human trafficking; sexual harassment; cyber harassment, and adolescent dating violence (ADV). Many of these terms are used as umbrella terms and are not mutually exclusive.

In Brighton & Hove, we recognise that VAWG, DA and SV is not limited to one type of violence or experience.

The table below defines some of the most prevalent forms of VAWG, DA and SV. However, this is not an exhaustive list, as VAWG, DA and SV manifests in diverse and complex ways. Each form may differ in nature, setting, and impact, affecting individuals and communities uniquely.

Term	Definition	Legislation
Domestic Abuse (Including Coercive Control)	Domestic abuse refers to incidents or a pattern of incidents of controlling, coercive, threatening, degrading, and violent behaviour, including sexual violence, committed by a partner, ex-partner, or family member, regardless of gender or sexuality. Abuse can be physical, emotional, economic, psychological, and/or sexual. The Domestic Abuse Act 2021 also recognises children as victims if they see, hear, or are otherwise affected by the abuse.	Domestic Abuse Act 2021
Rape and Sexual Violence	Rape is defined as non-consensual penetration of the vagina, anus, or mouth with a penis. Consent must be given freely, and there must be the capacity to make that choice. Sexual violence includes acts committed without the victim's consent, encompassing both physical force and psychological pressure.	Sexual Offences Act 2003
Female Genital Mutilation (FGM)	Female Genital Mutilation is the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons.	Female Genital Mutilation Act 2003

So-Called "Honour"-Based Abuse	An incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community's code of behaviour	Crown Prosecution Service definition
Sexual Harassment	Sexual harassment is unwanted behaviour of a sexual nature that violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating, or offensive environment.	Equality Act 2010
Stalking	Stalking involves a pattern of persistent and unwanted behaviour or attention that causes the victim to feel scared, harassed, or anxious.	Protection from Harassment Act 1997
Modern Slavery	Modern slavery is a term that encompasses human trafficking, forced labour, and servitude. It involves the exploitation of a person through force, coercion, or deception, for another's gain.	Modern Slavery Act 2015
Economic Abuse	Economic abuse involves controlling a person's ability to acquire, use, and maintain economic resources, effectively limiting their independence. It may include withholding money, preventing access to employment, or controlling access to essentials.	Domestic Abuse Act 2021
Digital or Digitally Enabled Abuse	Abuse that occurs or is facilitated through digital platforms harassment, revenge porn, and coercive control through monitoring and surveillance of digital devices.	Domestic Abuse Act 2021 (in cases of coercive control) and the Online Safety Act 2024
Forced Prostitution and Human Trafficking	Forced prostitution involves coercing someone into commercial sex acts against their will. Human trafficking is the recruitment, transport, or harbouring of individuals for exploitation.	Modern Slavery Act 2015 and Sexual Offences Act 2003 .

Understanding VAWG, DA and SV and public spaces:

Creating safe public spaces is a critical component of the partnership's strategy to address VAWG, DA and SV. Research consistently shows that women and girls disproportionately face harassment and violence in public places, limiting their freedom and sense of safety. The Safer Streets Programme has been a key initiative in addressing these concerns, focusing on practical interventions such as street lighting, installation of CCTV, and enhanced police patrols in identified high-risk areas. These measures, alongside public awareness campaigns, are designed to deter perpetrators and create environments where women and girls feel empowered and protected.

However, safety in public spaces is not only about physical infrastructure. The strategy also emphasises the importance of community-based approaches, including bystander intervention training, and partnerships with local businesses and transport providers to ensure a collective response to VAWG, DA and SV. Insights from local surveys and consultations have informed targeted actions, resources are directed to areas where women report feeling unsafe.

Through collaboration with national funding programs, such as Safer Streets, and local organisations, we aim to create a city where every resident can navigate public spaces without fear. This commitment is underpinned by the understanding that tackling VAWG, DA and SV requires addressing not just the symptoms of violence but the cultural and societal norms that enable it, ensuring Brighton & Hove remains inclusive and secure for all.

Public Safety Consultation on VAWG conducted in 2022:

The survey revealed that the most prevalent form of VAWG experienced was sexual harassment. A significant 45% of respondents reported having experienced sexual harassment, while 21% had witnessed someone else being sexually harassed.

When it comes to perceptions of safety in the city, there is a stark contrast between day and night. While 65% of respondents felt safe during the day, a concerning 77% felt unsafe at night.

General concerns about safety when out in public were also highlighted, with 44% of respondents stating they were worried and 21% being very worried while walking.

The responses regarding safety on public transport were mixed. Overall, 59% of respondents felt safe on the bus, but 39% were worried about safety when using the train, and 33% were not concerned.

Licensed premises and nightclubs were identified as risk areas by respondents. Specifically, 36% felt that licensed premises posed a risk, and a higher 57% felt that nightclubs were risky.

Snapshot of National Data – Year Ending 2024

Domestic Abuse

- **Police-Flagged Incidents:** Police recorded 830,926 domestic abuse-related offences in the year ending June 2024, showing an 8% decrease from in the year ending June 2023 (906,708 recorded offences).
- Changes in crime recording practices may influence this decrease, potentially resulting in underreported figures.

Office for National Statistics (2024). Crime in England and Wales: year ending September 2023. [Crime in England and Wales - Office for National Statistics](#)

CPS Referrals and Prosecutions:

- Police referred 69,589 domestic abuse cases to the Crown Prosecution Service (CPS) in 2023, a slight increase from the prior year but still well below pre-pandemic levels (86,665 referrals in 2019). Domestic abuse prosecutions (51,323) and convictions (39,033) have similarly dropped from 2019 levels, when they were 85,702 and 53,648, respectively.

Crown Prosecution Service (2024). CPS data summary Quarter 2 2023-2024. [CPS data summary Quarter 2 2023-2024 | The Crown Prosecution Service](#)

Prevalence of Domestic Abuse

- **Crime Survey for England and Wales (CSEW):** For June 2024, CSEW estimates indicate that 4.6% of people aged 16 and over experienced domestic abuse, in the previous year according to the survey in the year ending (YE) June 2024.

Office for National Statistics (2024). Crime in England and Wales: year ending September 2023. [Crime in England and Wales - Office for National Statistics](#)

Rape and Sexual Violence

- **Police-Recorded Offences:** Police recorded 191,186 sexual offences in the year ending September 2023, a 3% reduction from the previous year six victims report rape to the police, meaning official figures may underrepresent the full scope of sexual violence.

Office for National Statistics (2024). Crime in England and Wales: year ending September 2023. [Crime in England and Wales - Office for National Statistics](#)

- **Convictions and Court Backlog:** Despite 67,938 rape offences recorded by police in 2023, only 2,008 convictions were secured, highlighting a significant gap in outcomes for survivors. The backlog of sexual offense cases in the Crown Court has reached a record high, with 10,141 cases awaiting trial—an increase of 21% from 2022 and a 196% rise compared to pre-pandemic levels in 2019.

Rape Crisis England & Wales, *Breaking Point Report*, 2023: [Breaking Point | Rape Crisis England & Wales](#)

Image-Based Sexual Abuse and Harassment

- **Revenge Porn Helpline:** In 2023, the helpline reported that they supported over 9,000 cases related to image-based abuse, with calls to the helpline more than tripling between 2021 and 2022. This rise highlights growing concerns over digital abuse.

Revenge Porn Helpline, *Annual Report*, 2022: [Revenge Porn Helpline 2022 Annual Report | SWGfL](#)

- **Harassment Among Young Women:** Data from the Office for National Statistics (ONS) reveals that nearly one in four women aged 16-24 experienced sexual harassment in 2023, with younger women particularly affected.

ONS. [Experiences of harassment in England and Wales - Office for National Statistics](#)

Public Sexual Harassment of Mixed-Race Girls

- **Plan International UK's Report, "Everything is Racialised on Top":** This report found that 88% of mixed-race girls reported experiencing public sexual harassment, compared to 75% of white girls. The report sheds light on the intersectional challenges faced by young girls, especially those from diverse backgrounds.

Sundaram, V., Jessop, N., Bell, B. & Jackson, E. (2022) <https://plan-uk.org/file/everything-is-racialised-reportpdf/download?token=bVe1kW6>- Plan International UK.

So-Called "Honour-Based" Abuse, Female Genital Mutilation (FGM), and Forced Marriage

- **Police-Reported Incidents:** In the year ending March 2024, police recorded 2,755 offences related to "honour-based" abuse (HBA), representing an 8% decrease from the previous year. Of these, 111 were FGM cases, and 201 involved forced marriage. Additionally, 20% of these incidents involved controlling or coercive behaviour, pointing to the prevalence of psychological abuse.

[Statistics on so called 'honour-based' abuse offences, England and Wales, year ending March 2024 - GOV.UK](#)

Brighton & Hove VAWG-Related Crime Data Snapshot – 2023/24

Total Recorded Crime

- Total crimes reported in 2023/2024: 29,078

Source: Sussex Police / B&H Community Safety Partnership

Domestic Abuse

- **Domestic Abuse Crimes:** 3,206, making up 11% of all recorded crime in Brighton & Hove for 2023/24.
- **Domestic Abuse Incidents:** 1,924 in 2023/24, down from 2,306 in 2019/20, mirroring a national trend of reported incidents decreasing slightly.
 - Note: A crime is recorded because it meets the requirements of the Home Office Counting Rules. Not all crimes are detected, a suspect identified and subsequently charged.

Source: Sussex Police / B&H Community Safety Partnership

Sexual Offences

- **Total Sexual Offences:** 1,209 offences were recorded in 2023/24.
- **Serious Sexual Offences:** 1,009 of these incidents were classified as *Serious Sexual Offences*.

Source: Sussex Police / B&H Community Safety Partnership

Stalking

- **Stalking Offences:** 460 stalking incidents were recorded in 2023/24.

(Source: Sussex Police / B&H Community Safety Partnership)

So-Called “Honour-Based” Violence (HBV)

- **HBV Crimes and Incidents:** 8 recorded cases in 2023/24.

Source: Sussex Police Special Reports

Female Genital Mutilation (FGM)

- **Newly Recorded FGM Patients:** 15 new patients with Brighton & Hove postcodes were identified in 2023/24.

Source: NHS Digital; numbers rounded for confidentiality

Demographic Data:

Due to recent reporting changes from Sussex Police, current demographic data (2023-2024) regarding victims or perpetrators is unavailable for inclusion in this report. We anticipate this data will be accessible **in the near future**.

However, it should be noted that VAWG can be experienced by anyone. We understand that a survivor's experience often intersects with other experiences linked to protected characteristics.

This can introduce additional risks and make it harder for people to seek support. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women and more so women with intersecting characteristics.

National statistics highlight that BME women suffer domestic abuse 1.5 times longer than their white counterparts (Safelives, 2020). Data also indicates that BME people are less likely to report VAWG.

Brighton & Hove City Council has commissioned a BME Domestic Abuse Capacity Building Service to work at the grassroots level to further improve understanding of and access to support for BME survivors. Our strategic approach will fully recognise intersectionality. This includes the experiences of the city's LGBTQ+ community, which report high levels of VAWG.

The council will continue to work closely with partners to ensure a continued focus on intersectionality.

Development Process:

The development of the strategic aims and this strategy was informed by a review of key documents, including national guidance to support victims and survivors of VAWG, DA and SV existing council strategies and engagement events between November 2023 and Jan 2024 and more:

1. Public Consultation: The council carried out a public consultation on the initial draft strategic aims. The feedback demonstrated strong support for our four key priorities.

- A Strengthened Coordinated Response: 75% of respondents strongly agreed, and 19% agreed.
- Prioritising Prevention: 79% strongly agreed, and 14% agreed.
- Support for Survivors: 88% strongly agreed, and 7% agreed.
- Building an Accountable Community and Changing Perpetrator Behaviour: 79% strongly agreed, and 13% agreed.

The consultation findings highlighted a number of themes for inclusion in future workplans, including:

- A focus on prevention
- The role of education and training
- Addressing perpetrator behaviour both by strengthening criminal justice response and behaviour change programmes
- Community-based services for children and young people, including working with them to raise awareness and educate them about VAWG, DA and SV
- Enshrining intersectionality in the response to VAWG, DA and SV, to ensure support for all survivors across all risk levels, including those with protected characteristics
- Improving safety in public spaces and promotion of Safety Apps
- Support for survivors who have no recourse to public funds/refugee status

2. Four sector specific events: Alongside the public consultation, we also organised workshops with local stakeholders and community members to discuss the four strategic priorities in detail, ensuring diverse perspectives were considered and securing active partner involvement.

- VAWG strategy consultation – A stronger coordinated community response (Thursday, December 7, 2023)
- VAWG strategy consultation- Prioritising Prevention (Tuesday, December 12, 2023)
- VAWG strategy consultation- Support for Survivors (Friday, December 15, 2023)
- VAWG strategy consultation- Accountable community and perpetrator behaviour (Wednesday, December 6, 2023)

3. Evidence-Based Analysis: We also utilised a range of data sources to inform our strategy, including:

- a. **Safe Accommodation Needs Assessment (2021):** Conducted across Sussex to understand the needs of victims requiring safe accommodation.
- b. **Quarterly Performance Monitoring:** Ongoing assessment of the effectiveness of commissioned services and Multi-Agency Risk Assessment Conferences (MARACs).
- c. **Public Survey on Safety in Brighton & Hove (2022):** Gathered public perceptions of safety across the city.

- d. **Community Safety Partnership Strategic Assessment Workshop (2022):** Shaped key strategic priorities.
- e. **Housing Consultations (Feb-Mar 2023):** Three workshop consultations with internal housing services officers.
- f. **Reimagine Brighton Event (Jan 2024):** Workshop sessions that contributed to the strategy's development and sense checked the strategic aims.
- g. **BHCC Leadership VAWG, DA and SV Summit (Sep 2024):** Brought together internal council leaders to council-wide align and strengthen strategy delivery.

4. Alignment with internal council strategic priorities: We also ensured that this strategy is aligned with internal core plans and strategies, taking a whole-council approach to reducing VAWG, DA and SV. The intersecting documents include:

- Brighton & Hove Council Plan 2023-2027³
- Community Safety and Crime Reduction Strategy 2023-2026.⁴
- Anti-Racism Strategy 2023-2028⁵
- Housing Strategy 2024-2029⁶

5. Regional Collaboration: Brighton & Hove City Council is dedicated to working alongside East and West Sussex County Councils to deliver a cohesive regional response. This includes our contribution to the Pan Sussex Domestic Abuse Support in Safe Accommodation Strategy (2021-2024), which enhances our regional efforts through collaboration.

6. Legislative Framework: The strategy is also underpinned by a robust legal framework. We regularly review and adapt to national legislation to ensure our practices remain effective and compliant. Key laws shaping our approach include:

- **Female Genital Mutilation Act (2003):** Criminalises the act of FGM, including aiding or taking a child abroad for the procedure.
- **Sexual Offences Act (2003):** Sets out a framework for addressing sexual offences, focusing on consent and protection.
- **Forced Marriage Act (2007):** Enables courts to issue Forced Marriage Protection Orders.
- **Anti-Social Behaviour, Crime and Policing Act (2014):** Provides measures to combat forced marriage and protect victims.
- **Coercive and Controlling Behaviour (2015):** Recognises non-physical abuse as a serious criminal offence.
- **Modern Slavery Act (2015):** Establishes stringent penalties for traffickers and support mechanisms for victims.
- **Stalking Protection Act 2019:** Introduces protective measures for victims of stalking.
- **Domestic Abuse Act 2021:** Expands protections, recognising children as victims when they witness abuse.
- **Non-Fatal Strangulation (2021):** Creates a specific offence under the Domestic Abuse Act, with severe penalties.
- **Marriage and Civil Partnership (Minimum Age) Act 2022:** Raises the minimum legal

³ [Brighton & Hove City Council plan 2023 to 2027 \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/council-and-democracy/council-plan/2023-2027-council-plan)

⁴ [Community safety and crime reduction strategy 2023 to 2026 \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/council-and-democracy/council-plan/2023-2026-council-plan)

⁵ [Anti-Racism Strategy 2023 to 2028 \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/council-and-democracy/council-plan/2023-2028-council-plan)

⁶ [New city housing strategy approved](https://www.brighton-hove.gov.uk/council-and-democracy/council-plan/2024-2029-council-plan)

age for marriage to 18.

- **Online Safety Act 2023:** Requires social media platforms to prevent harmful content, including digital abuse.
- **Victims and Prisoners Bill 2023:** Enhances rights and support for victims of crime. Protection against various forms of discrimination, including gender-based violence.

7. Lessons from Safeguarding Reviews: Lessons learned from safeguarding children reviews nationally often highlight the presence of VAWG, DA and SV-related crimes. In 2021, the Brighton & Hove Adult Safeguarding Board (SAB) commissioned a thematic review into the deaths of three women with multiple compound needs. These women experienced various forms of VAWG, DA and SV including homelessness, substance misuse, offending, and physical and mental health issues. All were repeat cases at the Multi-Agency Risk Assessment Conference (MARAC) across Sussex. The review's recommendations are being implemented, including changes to the local MARAC operating protocol to improve joint working.

8. Domestic Homicide Reviews: Since 2011, Community Safety Partnerships have been statutorily required to conduct Domestic Homicide Reviews (DHRs) to examine the circumstances and partnership responses before and after domestic abuse murders. These reviews highlight how partnerships respond to domestic abuse and enable local partnerships to learn lessons to improve future practice. The council has completed six reviews since 2011, with another fatality review commissioned in 2024. A government consultation on the DHR process is underway, considering firmer guidance for DHRs in cases of death by suicide with a significant history of domestic abuse. A 2021 national audit of 124 DHRs identified 10 key themes, including the need for greater agency contact with victims and recognition of perpetrators' control over victims' agency interactions.

9. Review of 'A Patchwork of Provision – How to Meet the Needs of Victims and Survivors Across England and Wales: A comprehensive analysis of this report allowed us to align our local priorities with its recommendations. By systematically examining the report's findings, we identified critical areas for improvement, such as the need for increased and sustained funding, enhanced awareness and outreach, and better coordination among agencies. This alignment ensures our strategic aims are data-driven, inclusive, and focused on delivering holistic and equitable support to all victims and survivors of domestic abuse.

Strategy into operation

The VAWG, DA and SV Strategy will move from planning to operation through a Coordinated Community Response, involving all partners across statutory services, voluntary sectors, and community stakeholders to play a part in ending VAWG, DA and SV across Brighton & Hove. To ensure effective implementation, accountability, and alignment with strategic objectives, a structured governance model will guide the delivery and tracking of actions.

VAWG, DA and SV Oversight Board

A dedicated VAWG, DA and SV Oversight Board will oversee the delivery of the action plan and progress towards the strategy's goals. Reporting to the Community Safety Partnership (CSP), the board will monitor actions, address emerging challenges, and adjust strategies as needed. Key elements include:

- Task and Finish Groups: Focused groups addressing specific areas like community coordination, prevention, survivor support, and perpetrator behaviour change. These groups will involve various agencies, organisations, and the community to ensure a collaborative approach.
- MARAC Steering Group: This group will focus on high-risk survivors of domestic abuse, ensuring they receive coordinated and targeted support through a multi-agency response.
- Domestic Abuse Related Death Review Oversight Board

Operational Groups

These groups will focus on specific areas to address VAWG, DA and SV issues:

- Housing: Integrating housing-related support, including compliance with the Domestic Abuse Act 2021.
- Early Intervention & Prevention Working Group: Coordinating services and early interventions.
- Multiple Compound Needs: Developing responses for vulnerable groups with complex needs, including sexual exploitation and cuckooing.
- Equalities & Inclusion: Addressing harmful practices and supporting minority ethnic communities, LGBTQ+ individuals, trafficking for sexual exploitation, elder abuse survivors, digital enabled abuse, Children Under age and those with disabilities.
- Perpetrator: Developing the response to perpetrators from early intervention to relentless pursuit of perpetrators.

Additional Operational Priorities

- Early Intervention: Focusing on education, family hubs, health services, public spaces, transport, and licensing.
- Digitally Enabled Abuse: Developing best practices to mitigate digital abuse impacts.
- Children Under Age: Ensuring the safety, well-being, and development of children under 18 through targeted protection, education, health services, safe environments, family support, and legal frameworks.
- White Ribbon Steering Group: Driving awareness and preventative action across communities.

- Voices of Lived Experience Group: Ensuring survivor perspectives are integrated into the strategy.

Statutory and Community Partnerships

To support the strategic aims, the governance structure includes partnerships with:

- Statutory Boards: Including the Safeguarding Executive Adult Board, Local Safeguarding Children Partnership, Community Safety Board, Health & Wellbeing Board, Sussex Health and Care Assembly, and Youthwise.
- Feedback Loops: Integration with groups such as the Domestic Abuse Related Death Reviews (DARDR) Oversight Panel and Risk and Review Groups (incorporating MARAC, MATAC, and court-related oversight) to maintain accountability and respond to risk.

Governance Structure (*For Design Team*)

VAWG Board: Positioned at the top of the diagram with dotted lines to Community Safety Partnership Board, and Health and Wellbeing Board.

Standing Groups:

- Multi-Agency:
- Domestic Abuse Death Related Panel
- MARAC Steering Group
- VAWG Provider Collaboration Meetings
- Perpetrator
- Multiple Disadvantage
- DA Act Housing Working Group Internal
- Equalities: To consider the response and resources

Time-Limited:

- Housing Operational Group: Focus on operational matters in Housing, Reciprocal Arrangements, and potential DAHA Accreditation
- Health and VAWG
- Task and Finish Groups as required

Our Actions

To ensure clear and targeted delivery, we have embedded the action plan directly under each strategic priority within this strategy document. For each priority, we have outlined specific actions to be taken and their intended outcomes, providing a focused approach that aligns with our commitment to transparency and accountability. This structure allows partners and stakeholders to clearly understand the desired impact of each action, supporting a coordinated effort towards achieving our overarching goals.

Priority one: A strengthened Community Coordinated Response

No	Action	Intended Outcome
1.1	Develop a revised governance and subgroup structure to deliver the VAWG, DA and SV Strategy, with quarterly reporting to the VAWG, DA and SV Oversight Board.	Establish a revised governance and subgroup structure to support the effective delivery of the Strategy, with quarterly progress reports provided to the VAWG, DA, and SV Oversight Board to ensure accountability and strategic alignment.
1.2	Disseminate Learning from Domestic Abuse Related Death Reviews (DARDR) to improve future service delivery and risk management	Share insights from Domestic Abuse Related Death Reviews (DARDR) across relevant services to enhance future service delivery and strengthen risk management practices, promoting a more informed and preventative approach to domestic abuse cases.
1.3	Institute mandatory VAWG, DA and SV Awareness training as part of induction for all Brighton & Hove City Council (BHCC) staff, ensuring that all employees are equipped to recognise, respond to, and signpost disclosures of VAWG, DA and SV	Implement mandatory VAWG, DA, and SV Awareness training as part of the induction process for all Brighton & Hove City Council (BHCC) staff, equipping employees with the knowledge to recognise, respond to, and appropriately signpost disclosures of violence against women and girls, domestic abuse, and sexual violence.
1.4	Expand action focused on improving safety in Public Spaces, with special focus on public transport, schools and libraries	Enhance safety measures in public spaces, prioritising public transport, schools, and libraries, to create secure environments where residents feel protected and supported, with targeted actions to prevent VAWG, DA and SV and respond to potential risks effectively.
1.5	Work with highways and planning to continually improve street lighting and ensure VAWG, DA and SV considerations are included in the City Plan, planning applications to build environment and public spaces.	Partner with highways and planning teams to enhance street lighting and incorporate VAWG, DA, and SV considerations into planning applications, ensuring that public spaces and the built environment are designed to prioritise safety and prevent violence.
1.6	Continue to support Operation Limelight Activity, aimed at raising awareness of Female Genital Mutilation (FGM) and other harmful practises	Maintain support for Operation Limelight activities to raise awareness of Female Genital Mutilation (FGM) and other harmful practices, enhancing public knowledge and preventative efforts within the community.

Priority two: Prioritising Prevention

No	Action	Intended Outcome
2.1	Develop links with young ambassadors and advisory groups to co-produce events and campaigns aimed at raising	Improved engagement with young people in decision-making processes related to VAWG, DA AND SV campaigns and events.

	VAWG, DA and SV awareness among young people.	
2.2	<p>Encourage venues in Brighton & Hove to adopt a commitment to VAWG, DA and SV prevention in the new Brighton & Hove licensing policy.</p> <p>This will include action on spiking, VAWG, DA and SV training for staff around identifying and acting on inappropriate sexualised behaviour and offending with regular reviews being undertaken</p>	Promote the adoption of a VAWG, DA, and SV prevention commitment within Brighton & Hove's licensing policy for local venues, including measures to address spiking, staff training on identifying and responding to inappropriate sexualised behaviour, and regular policy reviews to ensure ongoing compliance and effectiveness.
2.3	Explore joint working initiatives with the ICB (Integrated Care Board) and /Public Health team to prevent VAWG, DA and SV in maternity services, sexual health services and community services and GPs	Explore collaborative initiatives with the Integrated Care Board (ICB) and Public Health team to prevent VAWG, DA, and SV within maternity services, sexual health services, community services, and GP practices, fostering a coordinated approach to early intervention and support across healthcare settings.
2.4	Strengthen interventions for individuals with multiple disadvantages, including children in care, who are at greater risk of experiencing violence against women and girls VAWG, DA and SV by identifying gaps, reducing duplication of efforts, and fostering interagency collaboration.	Strengthened, coordinated interventions for clients with multiple compound needs through collaborative, innovative approaches and improved resource allocation. The approach aims to provide earlier and more effective support to prevent VAWG, DA, and SV among vulnerable groups by addressing gaps and reducing duplication across agencies.
2.5	Strengthen the offer to education sector to raise awareness of VAWG, DA and SV amongst young people, using a "whole school approach" and the work of the Harmful Sexual Practises Group. Include considerations of the adultification of young black girls and link VAWG, DA and SV awareness to anti-bullying work.	<p>Improved pathways to support for young people by integrating VAWG, DA and SV into school environment.</p> <p>Delivery of VAWG, DA and SV related education programmes, ensuring young people are educated on the impact and prevention of VAWG, DA and SV.</p>
2.6	Support the Family Hubs to share information on VAWG, DA and SV and provide a consistent process for disclosing information to protect those at risk of harm.	Increased safety for individuals at risk of VAWG, DA and SV through better information sharing and consistent processes for disclosure in Family Hubs.

Priority Three: Support for Survivors

No	Action	Intended Outcome
3.1	Monitor the impact of key criminal justice system changes on VAWG, DA and SV including the early release of prisoners, the introduction of specialist Domestic Abuse (DA) courts in Sussex, developments from Operation Soteria (focusing on rape and sexual offences), and the ongoing work of the Stalking Clinic.	Local VAWG, DA and SV response is continually informed by the latest criminal justice developments and evaluation of service providers and partners are fully informed on criminal justice system trends and policy changes, allowing for more responsive and adaptive services.
3.2	Hold twice yearly workshops with individuals who have lived experience of VAWG, DA and SV to consult on key issues, gather feedback on local services, and ensure that a wide range of victim experiences are represented.	Organise workshops with individuals who have lived experience of VAWG, DA, and SV to consult on key issues, collect feedback on local services, and incorporate diverse victim perspectives, ensuring that service improvements and strategies are responsive to the needs of those affected.
3.3	Develop a comprehensive VAWG , DA and SV Information Pack specifically for the Housing Team, providing victims with clear knowledge of their housing options and available support.	Victims/Survivors are better informed of their housing and safety options, allowing them to make informed decisions and access appropriate support.
3.4	Monitor the implementation of the recommendations of the Stonewater Safehaven by the Sea Report	Establish a monitoring framework to oversee the implementation of recommendations from the "Safe Haven by the Sea" report, ensuring that actions are effectively executed and contribute to enhancing support services for domestic abuse survivors in Brighton & Hove
3.5	Collaborate with the Business Community to improve access to support for survivors Including employees and members of the public.	Partner with the business community to improve access to support for survivors of VAWG, DA, and SV, ensuring that both employees and members of the public are aware of available resources and support services, and fostering safer workplaces and community spaces.
3.6	Review gaps in provision related to disability due to evidence from data which highlights high levels of victim survivors with disabilities and VAWG, DA and SV intersect	Conduct a review of service provision gaps for survivors with disabilities, using data insights that indicate high levels of VAWG, DA, and SV within this group. This review will inform targeted improvements to ensure accessible, inclusive support for survivors with disabilities, addressing the specific challenges where disability intersects with experiences of violence and abuse.
3.7	Ensure that VAWG, DA and SV is referenced and integrated into the Violence Reduction workplan to meet legal obligations and ensure VAWG, DA and SV is a core focus in broader violence reduction strategies	Integrate VAWG, DA, and SV into the Violence Reduction workplan, ensuring that these areas are prioritised and aligned with legal obligations. This will make VAWG, DA, and SV a core focus within broader violence reduction strategies, fostering a comprehensive and inclusive approach to community safety.
3,8	Continue to support the	Work with Housing and partners across Sussex to

	development of Reciprocal Housing Arrangements	develop Reciprocal Housing Arrangements to support survivors to maintain tenancy status in line with Domestic Abuse Act 2021
3,9	Review the support offer and gaps in provision to children and families who have experienced VAWG and in particular children in care and care leavers, to ensure there is robust support and adequate understanding on the impact of VAWG on children and young adults.	Increase referrals of care leavers and children in care to the children and young peoples DA case worker.

Priority four: Building an accountable community and changing perpetrator behaviour

No	Action	Intended Outcome
4.1	Work with communities via forums and public events to change the culture and beliefs that underpin VAWG, DA and SV using education and awareness to shift attitudes	Improved understanding of VAWG, DA and SV within communities, with a shift in cultural norms and beliefs that contribute to VAWG, DA and SV
4.2	Support Sussex Police to offer behaviour change interventions at the Custody Suite, ensuring earlier stage interventions to address abusive behaviour	Perpetrators are offered an intervention to change behaviour at an earlier stage, reducing risk of future harm.
4.3	Work with Children's Services to collaborate and develop policies and processes in place for assessing and working with perpetrators of domestic abuse and other forms of VAWG, DA and SV when safeguarding children and the non-abusing parent.	Improved practitioner response to safeguarding risks and better understanding of abusive or neglectful parenting in VAWG, DA and SV contexts. Dissemination of information to change the beliefs that underpin VAWG, DA and SV.
4.4	Scope and develop a Men in Sheds initiative locally at Jubilee Library to educate men on perpetrator behaviour and increase awareness of support services for male victims.	More male victims of VAWG, DA AND SV can come forward to be supported.
4.5	Continue to fund behaviour change programmes including adults, young people, and LGBTQ+ perpetrators, ensuring long-term support for behaviour change.	Behaviour change programmes are accessible for all perpetrators, with a focus on sustainability and addressing diverse needs, including LGBTQ+ perpetrators.
4.6	Support the forthcoming Safer Streets programme	The Government has confirmed that the Safer Streets programme will be the funding for their delivery of their mission to halve VAWG, DA and SV in 10 years. Details to be announced but previous funding has linked to safety in public spaces and limiting perpetrator's ability to act in public spaces

Conclusion

This strategy sets out the role we can all play in responding to and ending Violence against women, domestic abuse and sexual violence. We welcome professionals, residents, and survivors to join us in achieving our four objectives.

Together, we can work to make our boroughs safer for anyone who is living, studying, working, visiting, and travelling in Brighton & Hove.

Appendix 1. The recommendations for the partnership from the “Safehaven by the Sea: a report on housing challenges and solutions for domestic abuse survivors in Brighton & Hove”

A number of recommendations were made based on feedback from survivors, professionals and models that are working well nationally, and are presented below under the agency which would be best placed to address them.

Brighton & Hove City Council VAWG Unit

It is acknowledged that the recommendations below align with the six strategic priorities captured within the Pan-Sussex Strategy for Domestic abuse Accommodation and Support 2021-2024, and as such encourage regional joint working/resourcing where appropriate.

- Form a domestic abuse and housing providers working group to develop co-ordinated responses across the range of providers.
- Continue commissioning of a dedicated refuge for female identifying survivors, consideration of increasing licence agreement period given the multiple complex needs of survivors.
- Consider dedicated LGBTQ+ safe accommodation in the needs assessment linked to pan-Sussex priorities in the refresh of the Pan-Sussex Domestic Abuse and Safe Accommodation Strategy.
- Consider domestic abuse support for those aged 55+ who have experienced abuse, ensuring this is linked to pan-Sussex priorities in the refresh of the Pan-Sussex Domestic Abuse and Safe Accommodation Strategy.
- Raise awareness of the No Recourse Fund and the Destitution Domestic Violence Concessions (DDVC) for those with an insecure immigration status to support with costs of safe accommodation.
- Ensure survivors in emergency accommodation are provided with a comprehensive support package which includes information on options and guidance around next steps – e.g. civil orders, flexible funds, refuges etc. This resource should be developed by the council’s VAWG Unit, updated regularly, and communicated to welfare officers and specialist services.
- Review the impact of the Enhanced DA Housing Pathway funded by the New Burdens Allocation.
- Continue to support joint working practices between the housing first model for rough sleepers and domestic abuse specialist agencies to ensure the right support is received at the right time.
- Develop training that is accessible to staff working in supported housing settings and the rented sector (e.g. landlords) to improve the response to disclosures and support with domestic abuse informed practice, including where intersecting needs are present.
- Consider creating a Children’s Advocacy Worker role to provide short term support to children who have been subjected to domestic abuse and are residing in safe accommodation, ensuring that their educational, social and wellbeing needs are being met.

- Consider creating a Domestic Abuse Safety Worker role who will support survivors in obtaining non-molestation orders and act as a McKenzie friend for those who are unable to obtain legal representation.
- Consider and explore a small-scale pilot project for housing perpetrators.

Brighton & Hove City Council – Housing Department

- Consider a review of risk assessments in ensuring suitability of temporary accommodation for survivors in partnership with specialist domestic abuse organisation.
- Raise awareness of the work of the Private Rented Team amongst local agencies, following feedback that pathways to private renting are unclear.
- Consult upon and share reviewed allocation policy amongst stakeholders.
- Consider a commitment to a service level agreement with Stonewater's refuge for the Temporary Accommodation Scheme.
- Consider gaining DAHA Accreditation, to ensure safe and effective responses to domestic abuse.
- Review efficacy and adherence of Emergency Accommodation Charter and consider the introduction of a Temporary Accommodation Charter to improve the quality of accommodation and accountability of landlords – with a domestic abuse lens.
- Consider the introduction of a Domestic Abuse Housing Officer role with responsibilities to include management of all domestic abuse cases including refuge cases and applications of civil orders for those wishing to remain in their homes.
- Introduce feedback model for domestic abuse survivors who are accessing the council's housing pathway to ensure that service improvement is ongoing.

Voluntary sector

- Continue horizon scanning for funding opportunities and consider Shared Lives Plus and Women in Safe Homes funding for survivors of domestic abuse. Consider joint/consortia funding bids.

Registered housing providers in Brighton and Hove

- Introduce reciprocal arrangements amongst registered providers across Sussex for households fleeing domestic abuse, with a co-ordination role resourced by registered providers or the council.
- Capture data around domestic abuse to allow understanding around scale of the issue.
- Map registered and supported housing providers within Brighton and Hove and develop coalitions to share approaches to identifying and responding to domestic abuse.
- Introduce a domestic abuse code of practice which reflects the newly introduced housing consumer standards, with a requirement to hold a domestic abuse specific policy, provide regular colleague training, seek DAHA membership/accreditation, and attend the South East DAHA Regional Group.
- Work with Stonewater to replicate the Southdown refuge move on pathway where viable.

Appendix 2. Glossary

AE	Accident and Emergency
A/perp	Alleged perpetrator
ASB	Anti-Social Behaviour
BHCC	Brighton & Hove City Council
BME	Black Minority Ethnic
CAG	Citizens Advisory Group
CCR	Coordinated Community Response
COE	Council of Europe
CSA	Child Sexual Abuse
DA	Domestic Abuse
DARA	Domestic Abuse Risk Assessment
DASH	Domestic Abuse, Stalking, Harassment, Honour Based Violence
DLUHC	Department of Levelling Up Housing and Communities
DVDS	Domestic Violence Disclosure Scheme
DHR	Domestic Homicide Review
HBV	Honour Based Violence
HIDVA	Health Independent Domestic Violence Advocate
HP	Harmful Practices
ICB	Integrated Care Board
IDVA	Independent Domestic Violence Advocate
LGBTQ+	Lesbian, Gay, Bisexual, Trans, Questioning
MARAC	Multi Agency Risk Assessment Conference
MATAC	Multi Agency Tasking and Coordination
MOP	MARAC Operating Protocol
PP	Perpetrator Programme
SAB	Safeguarding Adults Board
SAR	Safeguarding Adults Review
SDVC	Specialist Domestic Violence Court
RISE	Refuge, Information, Support and Education
RP	Registered Providers
VAWG	Violence Against Women and Girls
VS	Victim Support
VSS	Victim Specialist Service
WSW	Woman's Safety Worker

Appendix 3: Domestic Abuse Act 2021

The Domestic Abuse Act 2021 On 29 April 2021, the Domestic Abuse Act 2021 ('the 2021 Act') received Royal Assent. The Act will:

- A. create a statutory definition of domestic abuse, emphasising that domestic abuse is not just physical violence, but can also be emotional, controlling or coercive, and economic abuse
- B. establish in law the office of Domestic Abuse Commissioner and set out the Commissioner's functions and powers
- C. provide for a new Domestic Abuse Protection Notice and Domestic Abuse Protection Order d) place a duty on local authorities in England to provide accommodation-based support to victims of domestic abuse and their children in refuges and other safe accommodation
- D. prohibit perpetrators of abuse from cross-examining their victims in person in the civil and family courts in England and Wales
- E. create a statutory presumption that victims of domestic abuse are eligible for special measures in the criminal, civil and family courts
- F. clarify the circumstances in which a court may make a barring order under section 91(14) of the Children Act 1989 to prevent family proceedings that can further traumatise victims
- G. extend the controlling or coercive behaviour offence to cover post-separation abuse
- H. extend the offence of disclosing private sexual photographs and films with intent to cause distress (known as the "revenge porn" offence) to cover threats to disclose such material
- I. create a new offence of non-fatal strangulation or suffocation of another person
- J. clarify by restating in statute law the general proposition that a person may not consent to the infliction of serious harm and, by extension, is unable to consent to their own death
- K. extend the extraterritorial jurisdiction of the criminal courts in England and Wales, Scotland and Northern Ireland to further violent and sexual offences
- L. provide for a statutory domestic abuse perpetrator strategy
- M. enable domestic abuse offenders to be subject to polygraph testing as a condition of their licence following their release from custody
- N. place the guidance supporting the Domestic Violence Disclosure Scheme ("Clare's law") on a statutory footing

- O. Provide that all eligible homeless victims of domestic abuse automatically have 'priority need' for homelessness assistance
- P.
- Q. ensure that where a local authority, for reasons connected with domestic abuse, grants a new secure tenancy to a social tenant who had or has a secure lifetime or assured tenancy (other than an assured shorthold tenancy) this must be a secure lifetime tenancy
- R. prohibit GPs and other health professionals in general practice from charging a victim of domestic abuse for a letter to support an application for legal aid
- S. provide for a statutory code of practice relating to the processing of domestic abuse data for immigration purposes

Appendix 4: Istanbul Convention

The Istanbul Convention is formally known as the '[Council of Europe Convention on preventing and combating violence against women and domestic violence](#)'. It was adopted by the [Council of Europe Committee of Ministers on 7 April 2011](#) and opened for signature on 11 May 2011 at

a session in Istanbul. The convention entered into force on 1 August 2014. The UK signed the convention on 8 June 2012. On 17 May 2022, the Home Secretary Priti Patel announced the [UK's intention to ratify the convention](#).

Article 1 of the convention states that its purposes are to:

- Protect women against all forms of violence, and prevent, prosecute and eliminate violence against women and domestic violence.
- Contribute to the elimination of all forms of discrimination against women and promote substantive equality between women and men, including by empowering women.
- Design a comprehensive framework, policies and measures for the protection of and assistance to all victims of violence against women and domestic violence.
- Promote international co-operation with a view to eliminating violence against women and domestic violence.
- Provide support and assistance to organisations and law enforcement agencies to effectively co-operate to adopt an integrated approach to eliminating violence against women and domestic violence.

The [Istanbul Convention has four pillars](#). Countries which have ratified the convention are required to take a range of measures around the following issues:

- Prevention, including awareness-raising campaigns, promoting women's empowerment, and training of professionals.
- Protection, including regional and international complaints mechanisms, protection or restraining orders, and safe custody and visitation rights for children.
- Prosecution. Measures on law enforcement and judicial proceedings include dissuasive sanctions for perpetrators, consideration of aggravating circumstances and legislation criminalising violence against women. On victim's rights, measures include no victim-blaming, victims' right to information and support and victims' protection during investigation and judicial proceedings.
- Co-ordinated policies, including inter-agency co-operation, human rights-based policies and comprehensive legislation and gender-sensitive policies

Currently, [35 member states of the Council of Europe have ratified the Istanbul Convention](#).

There are 10 signatories which are yet to ratify the treaty (including the UK). Turkey withdrew from the treaty in July 2021. The Council of Europe has 46 member states

UK ratification:

The UK ratified the Council of Europe Convention on preventing and combating violence against women and domestic violence in July 2022.

Brighton & Hove City Council: Preventing and tackling VAWG, DA and SV Action Plan

To ensure clear and targeted delivery, we have embedded the action plan directly under each strategic priority within this strategy document. For each priority, we have outlined specific actions to be taken and their intended outcomes, providing a focused approach that aligns with our commitment to transparency and accountability. This structure allows partners and stakeholders to clearly understand the desired impact of each action, supporting a coordinated effort towards achieving our overarching goals.

Priority one: A strengthened Community Coordinated Response

No	Action	Intended Outcome
1.1	Develop a revised governance and subgroup structure to deliver the VAWG, DA and SV Strategy, with quarterly reporting to the VAWG, DA and SV Oversight Board.	Establish a revised governance and subgroup structure to support the effective delivery of the Strategy, with quarterly progress reports provided to the VAWG, DA, and SV Oversight Board to ensure accountability and strategic alignment.
1.2	Disseminate Learning from Domestic Abuse Related Death Reviews (DARDR) to improve future service delivery and risk management	Share insights from Domestic Abuse Related Death Reviews (DARDR) across relevant services to enhance future service delivery and strengthen risk management practices, promoting a more informed and preventative approach to domestic abuse cases.
1.3	Institute mandatory VAWG, DA and SV Awareness training as part of induction for all Brighton & Hove City Council (BHCC) staff, ensuring that all employees are equipped to recognise, respond to,	Implement mandatory VAWG, DA, and SV Awareness training as part of the induction process for all Brighton & Hove City Council (BHCC) staff, equipping employees with the knowledge to recognise, respond to, and appropriately signpost disclosures of violence against women and girls, domestic abuse, and sexual violence.

	and signpost disclosures of VAWG, DA and SV	
1.4	Expand action focused on improving safety in Public Spaces, with special focus on public transport, schools and libraries	Enhance safety measures in public spaces, prioritising public transport, schools, and libraries, to create secure environments where residents feel protected and supported, with targeted actions to prevent VAWG, DA and SV and respond to potential risks effectively.
1.5	Work with highways and planning to continually improve street lighting and ensure VAWG, DA and SV considerations are included in the City Plan, planning applications to build environment and public spaces.	Partner with highways and planning teams to enhance street lighting and incorporate VAWG, DA, and SV considerations into planning applications, ensuring that public spaces and the built environment are designed to prioritise safety and prevent violence.
1.6	Continue to support Operation Limelight Activity, aimed at raising awareness of Female Genital Mutilation (FGM) and other harmful practises	Maintain support for Operation Limelight activities to raise awareness of Female Genital Mutilation (FGM) and other harmful practices, enhancing public knowledge and preventative efforts within the community.

Priority two: Prioritising Prevention

No	Action	Intended Outcome
2.1	Develop links with young ambassadors and advisory groups to co-produce events and campaigns aimed at raising VAWG, DA and SV awareness among young people.	Improved engagement with young people in decision-making processes related to VAWG, DA AND SV campaigns and events.
2.2	Encourage venues in Brighton & Hove to adopt a	Promote the adoption of a VAWG, DA, and SV prevention commitment within Brighton & Hove's

	<p>commitment to VAWG, DA and SV prevention in the new Brighton & Hove licensing policy.</p> <p>This will include action on spiking, VAWG, DA and SV training for staff around identifying and acting on inappropriate sexualised behaviour and offending with regular reviews being undertaken</p>	<p>licensing policy for local venues, including measures to address spiking, staff training on identifying and responding to inappropriate sexualised behaviour, and regular policy reviews to ensure ongoing compliance and effectiveness.</p>
2.3	<p>Explore joint working initiatives with the ICB (Integrated Care Board) and /Public Health team to prevent VAWG, DA and SV in maternity services, sexual health services and community services and GPs</p>	<p>Explore collaborative initiatives with the Integrated Care Board (ICB) and Public Health team to prevent VAWG, DA, and SV within maternity services, sexual health services, community services, and GP practices, fostering a coordinated approach to early intervention and support across healthcare settings.</p>
2.4	<p>Strengthen interventions for individuals with multiple disadvantages who are at greater risk of experiencing violence against women and girls VAWG, DA and SV by identifying gaps, reducing duplication of efforts, and fostering interagency collaboration.</p>	<p>Strengthened, coordinated interventions for clients with multiple compound needs through collaborative, innovative approaches and improved resource allocation. The approach aims to provide earlier and more effective support to prevent VAWG, DA, and SV among vulnerable groups by addressing gaps and reducing duplication across agencies.</p>
2.5	<p>Strengthen the offer to education sector to raise awareness of VAWG, DA and SV amongst young people, using a “whole school approach” and the work of the Harmful Sexual</p>	<p>Improved pathways to support for young people by integrating VAWG, DA and SV into school environment.</p> <p>Delivery of VAWG, DA and SV related education programmes, ensuring young people are</p>

	Practises Group. Include considerations of the adultification of young black girls and link VAWG, DA and SV awareness to anti-bullying work.	educated on the impact and prevention of VAWG, DA and SV.
2.6	Support the Family Hubs to share information on VAWG, DA and SV and provide a consistent process for disclosing information to protect those at risk of harm.	Increased safety for individuals at risk of VAWG, DA and SV through better information sharing and consistent processes for disclosure in Family Hubs.

Priority Three: Support for Survivors

No	Action	Intended Outcome
3.1	Monitor the impact of key criminal justice system changes on VAWG, DA and SV including the early release of prisoners, the introduction of specialist Domestic Abuse (DA) courts in Sussex, developments from Operation Soteria (focusing on rape and sexual offences), and the ongoing work of the Stalking Clinic.	Local VAWG, DA and SV response is continually informed by the latest criminal justice developments and evaluation of service providers and partners are fully informed on criminal justice system trends and policy changes, allowing for more responsive and adaptive services.
3.2	Hold twice yearly workshops with individuals who have lived experience of VAWG, DA and SV to consult on key issues, gather feedback on local services, and ensure	Organise workshops with individuals who have lived experience of VAWG, DA, and SV to consult on key issues, collect feedback on local services, and incorporate diverse victim perspectives, ensuring that service

	that a wide range of victim experiences are represented.	improvements and strategies are responsive to the needs of those affected.
3.3	Develop a comprehensive VAWG , DA and SV Information Pack specifically for the Housing Team, providing victims with clear knowledge of their housing options and available support.	Victims/Survivors are better informed of their housing and safety options, allowing them to make informed decisions and access appropriate support.
3.4	Monitor the implementation of the recommendations of the Stonewater Safehaven by the Sea Report	Establish a monitoring framework to oversee the implementation of recommendations from the "Safe Haven by the Sea" report, ensuring that actions are effectively executed and contribute to enhancing support services for domestic abuse survivors in Brighton & Hove
3.5	Collaborate with the Business Community to improve access to support for survivors Including employees and members of the public.	Partner with the business community to improve access to support for survivors of VAWG, DA, and SV, ensuring that both employees and members of the public are aware of available resources and support services, and fostering safer workplaces and community spaces.
3.6	Review gaps in provision related to disability due to evidence from data which highlights high levels of victim survivors with disabilities and VAWG, DA and SV intersect	Conduct a review of service provision gaps for survivors with disabilities, using data insights that indicate high levels of VAWG, DA, and SV within this group. This review will inform targeted improvements to ensure accessible, inclusive support for survivors with disabilities, addressing the specific challenges where disability intersects with experiences of violence and abuse.
3.7	Ensure that VAWG, DA and SV is referenced and integrated into the Violence Reduction workplan to meet legal obligations and ensure VAWG, DA and SV is a core focus in broader violence reduction strategies	Integrate VAWG, DA, and SV into the Violence Reduction workplan, ensuring that these areas are prioritised and aligned with legal obligations. This will make VAWG, DA, and SV a core focus within broader violence reduction strategies, fostering a comprehensive and inclusive approach to community safety.

3,8	Continue to support the development of Reciprocal Housing Arrangements	Work with Housing and partners across Sussex to develop Reciprocal Housing Arrangements to support survivors to maintain tenancy status in line with Domestic Abuse Act 2021
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Priority four: Building an accountable community and changing perpetrator behaviour

No	Action	Intended Outcome
4.1	Work with communities via forums and public events to change the culture and beliefs that underpin VAWG, DA and SV using education and awareness to shift attitudes	Improved understanding of VAWG, DA and SV within communities, with a shift in cultural norms and beliefs that contribute to VAWG, DA and SV
4.2	Support Sussex Police to offer behaviour change interventions at the Custody Suite, ensuring earlier stage interventions to address abusive behaviour	Perpetrators are offered an intervention to change behaviour at an earlier stage, reducing risk of future harm.
4.3	Work with Children's Services to collaborate and develop policies and processes in place for assessing and working with perpetrators of domestic abuse and other forms of VAWG, DA and SV when safeguarding children and the non-abusing parent.	Improved practitioner response to safeguarding risks and better understanding of abusive or neglectful parenting in VAWG, DA and SV contexts. Dissemination of information to change the beliefs that underpin VAWG, DA and SV.
4.4	Scope and develop a Men in Sheds initiative locally at Jubilee Library to educate men on perpetrator behaviour and	More male victims of VAWG, DA AND SV can come forward to be supported.

	increase awareness of support services for male victims.	
4.5	Continue to fund behaviour change programmes including adults, young people, and LGBTQ+ perpetrators, ensuring long-term support for behaviour change.	Behaviour change programmes are accessible for all perpetrators, with a focus on sustainability and addressing diverse needs, including LGBTQ+ perpetrators.
4.6	Support the forthcoming Safer Streets programme	The Government has confirmed that the Safer Streets programme will be the funding for their delivery of their mission to halve VAWG, DA and SV in 10 years. Details to be announced but previous funding has linked to safety in public spaces and limiting perpetrator's ability to act in public spaces

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025-2028
Directorate:	City Services
Service:	Safer Communities Team
Team:	Violence Against Women and Girls Unit

Is this a new or existing activity?	Existing
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Anne Clark, Strategic Lead Commissioner Domestic Abuse and VAWG
Accountable Manager:	Jim Whitelegg, Interim Head of Safer Communities
Additional stakeholders collaborating or contributing to this assessment:	General Public, stakeholders contributing to consultation events.

3. About the activity

Briefly describe the purpose of the activity being assessed:

Brighton and Hove City Council is developing its Preventing and Tackling Violence against Women and Girls, Domestic Abuse and Sexual Violence Strategy which sets out the strategic direction of the Council and its partners in responding to and tackling violence against women and girls from 2025-2028. The strategy is aimed at a wide sector of the community including residents, professionals and those affected by abuse. The aim of the strategy is to develop a consistent coordinated community response to Violence Against Women and Girls (VAWG) Domestic Abuse (DA) and Sexual Violence (SV) prevent harm, strengthen the system, support those affected and hold perpetrators to account.

What are the desired outcomes of the activity?

The aim of the Strategy is to make the city safer and to make a noticeable difference to the everyday lives of all those affected by VAWG/DA/SV in the city.

To deliver this vision, the strategy sets out four priority areas:

- **A stronger co-ordinated response.**
- **Prioritising prevention.**
- **Support for survivors.**
- **Building an accountable community and changing perpetrator behaviour.**

This EIA takes into account our feedback from several consultations on what should be included within the Strategy with the current evidence base around VAWG/DA/SV. This was supported by national and regional based evidence on these crimes, both perpetration and victimisation. These findings are contained in the section on consultation.

While this EIA lists each protected characteristic individually, it is acknowledged that there are intersections between these – where the victim or survivors experience a combination of the factors/protected characteristics listed below there is a greater chance of increased vulnerability and disadvantage (an example would include insecure immigration status). The Strategy seeks to respond to this and by affirming the need to respond to VAWG/DA/SV through an intersectional lens to fully support victims and survivors and hold those who abuse to account.

This EIA acknowledges that the experience of every survivor may intersect with the circumstances and experiences aligned with their own specific protected characteristic/s. This Equality Impact Assessment (EIA) will be assessing the impacts that the proposed strategy may have on diverse protected characteristics and different communities based on our current knowledge and assessment.

The strategy is underpinned by a detailed action plan which includes measures of success and will support the ambition of the strategy and strengthen its One Council Approach.

Which key groups of people do you think are likely to be affected by the activity?

Everyone working, studying or living in the City.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

This is a partnership strategy and has been developed in consultation with stakeholders and residents, and with reference to the local and national strategic landscape. There have been a number of specific pieces of work that have informed the evidence base for this strategy. They have included:

- Safe accommodation needs assessment (2021). The needs assessment considered data from across Sussex to understand the support in safe accommodation needs for victims
- Public Survey to research how safe people feel in Brighton and Hove. 2022
- Community Safety Partnership Strategic Assessment Workshop 2022
- Housing Consultations x 3 in February and March 2023
- Five Stakeholder Consultation events in December 2023
- Public Survey to seek public opinion on the draft Violence Against Women and Girls Strategy. November 2023 to January 2024
- Reimagine Combatting Violence Against Women and Girls Event 29 January 2024
- VAWG Summit with Council staff September 2024

Learning from Brighton & Hove City Council Consultations/Surveys on Violence against women

Two public surveys were undertaken to survey the general public about their views on violence against women and girls. The first focused on VAWG in public spaces which ran from 10/01/2022 to 20/02/2022 to understand concerns about VAWG in our city. From the 614 responses, the following issues were highlighted:

The most prevalent form of VAWG experienced was sexual harassment with 45% stating they had experienced this and 21% stating they had witnessed another person being sexually harassed. Whilst perceptions of safety in the city highlighted that 65% felt safe in the day with 77% stating they felt unsafe at night.

Respondents also had concerns when out in public with:

- 44% stating they were worried and 21% being very worried whilst out walking

There was a mixed response to safety when using public transport. Overall, 59% of respondents confirmed they felt safe on the bus service with 39% reporting they were worried about safety when using the train and a further 33% stating they were not.

- Licensed premises were felt to be worrying by 36% and not worrying by 32% with 24% neither worried or unworried.
- Clubs. 57% of respondents identified nightclubs as being worrying.

A second public consultation on the draft VAWG strategy was responded to by 233 people. Public opinion on the priorities confirmed that:

- **A stronger co-ordinated response.** 233 people responded to this question 75% (176) strongly agreed with a further 19% (46) agreeing with the priority.
- **Prioritising prevention.** 229 people responded to this question, of these 79% (184) strongly agreed and 14% (32) agreed with the priority.
- **Support for survivors.** There were 229 responses to this part of the question. Of those, 88% (204) strongly agreed and a further 7% (17) agreed with the priority.
- **Building an accountable community and changing perpetrator behaviour.** There were 233 responses to this part of the survey with 185 (79%) strongly agreeing and a further 30 (13%) agreed with the priority.

Of those that responded to the survey, there were 60 people (26%) with lived experience of VAWG and their valuable contributions highlighted a number of themes which will be incorporated in the strategy delivery plans going forward. These include:

- The importance of listening to those with lived experience and believing them and treating them with respect so their dignity is maintained.
- Improve how perpetrators' behaviour is addressed both by strengthening criminal justice response and behaviour change programmes
- Improved provision for children and young people affected by VAWG
- The importance of working with children and young people to raise awareness and educate them about VAWG.
- Services to work in a coordinated manner
- Enshrining intersectionality in the response to VAWG
- Ensuring support for all survivors across all risk levels including those with protected characteristics
- Improving safety in public spaces
- Support for survivors including safe housing
- Ensure the response to VAWG includes consideration of prostitution/sex work.
- The promotion of Safety Apps
- Support for survivors who have no recourse to public funds/refugee status

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity?
 Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	People with lived experience of all forms of VAWG, and those experiencing multiple forms of disadvantage

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)

- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

We will add them to the data monitoring for commissioned services and the Multi Agency Risk Assessment Conference (MARAC) to align with the Councils Equalities Monitoring Standards data set

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The workplan for the Preventing and Tackling VAWG, Domestic Abuse and Sexual Violence Strategy, monitoring of commissioned services and future Needs Assessments

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research

- National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES. Women and girls are disproportionately affected by these forms of abuse
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All forms of VAWG can affect victims/survivors of any age. The experience of VAWG and victimisation can vary depending on age and life stage. The Crime Survey for England and Wales (CSEW) provides prevalence data disaggregated by protected characteristics and socio-demographic factors. The data suggests that younger women are disproportionately impacted by some VAWG offences. It is not possible to compare rates of domestic abuse, sexual assault and stalking experienced by survivors sharing protected characteristics or socio-demographic characteristics, or to analyse rates over time, limiting analysis.

The average age of people accessing Independent Domestic Violence Advocate (IDVA) services in England and Wales is 35, and the average age of people accessing Sexual Violence services in England and Wales is 27.

The Domestic Abuse Act (2021) now legally recognises children living in homes where domestic abuse occurs as victims of the abuse in their own right.

Children and young people are main victims of FGM (Female Genital Mutilation), often undertaken at a very young age and do not recognise what they have experienced until many years later.

A NSPCC report (Barter et al., 2009) found that almost 25% of 13–17-year-old girls reported experiencing physical abuse in their own intimate partnership relationships whilst 18% of boys reported experiencing physical abuse. Young people face risks and challenges that older people do not. For example, risks relating to grooming, exploitation, and abuse. Young people also experience online VAWG/DA/SV at higher rates than other age group, www.crimeandjustice.org.uk

Ofsted undertook a review in 2021 following the thousands of disclosures of sexual harassment and abuse in schools nationally, colleges and universities. The review highlights the importance of multi-agency work to combat VAWG. This finding was cited in the HMI Constabulary Report commissioned by the Home Office which called for cross system to tackle the "epidemic of VAWG".

Our strategy includes a commitment to continue to support initiatives for young people impacted by VAWG with an aim to improve the approach to addressing the often less-visible needs of young people and ensure that young people and women impacted by VAWG are better identified and supported, with an understanding of the context of their individual characteristics.

We have included an action to work with partners including the NHS, Sussex Police, the Office of Police and Crime Commissioner, the voluntary and community sector and pan-Sussex authorities to continue to fund and extend support, applying an intersectional lens, for victims of VAWG.

Hourglass deliver specialist services for victims/survivors aged 55 plus and have highlighted the frequency that older people experience economic and financial abuse including abuse of power of attorney.

Key strategic commitments that respond to this characteristic:

- We will work with all partners to explore how we can enhance our intersectional data use and collection to improve our understanding of VAWG in Brighton and Hove.
- In partnership with the Office of the Police and Crime Commissioner (OPCC) we will continue to deliver awareness sessions which aim to educate Year 9 boys and girls about sexual harassment.
- The VAWG Unit will work with partners including the NHS, the Police, the voluntary and community sector and local authorities to continue to extend support, applying an intersectional lens, for child victims of domestic abuse, sexual abuse and exploitation and adults who may be victimised by their own children and families.
- The Council will continue to pilot early intervention projects including the Family Hub model to frame domestic abuse as a harmful parenting practice to enable social workers to focus on the perpetrators' behaviour and support the non-abusing parent.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The CSEW reported that people with a long-standing illness or disability were more than twice as likely to experience some form of domestic abuse than their counterparts with no longstanding illness or disability. Amongst women, this figure is higher with of female victims of domestic abuse reporting at least one disability. Deaf and disabled women are twice as likely as their hearing and non-disabled peers to suffer domestic abuse, (British Crime Survey, 2020).

SafeLives data also shows that 11.9% of cases heard at MARAC involved disabled people. This is significantly higher for Brighton and Hove MARAC with **33% of MARAC** cases identifying as having a disability. Despite this startling statistic, there is a clear gap in data available in understanding the prevalence of all types of disabilities for victims and survivors of VAWG. There is limited data for all types of disabilities, however those with learning disabilities appear to be further hidden.

Feedback from specialist services highlighted that that there is a real risk that victims and survivors of VAWG can develop disabilities due to the emotional and physical impact of the abuse and/or violence. This was also mirrored in the feedback to the public consultation from Brighton and Hove residents for the Pan Sussex Domestic Abuse and Support in Safe Accommodation Strategy, 2021- 2024. Feedback highlighted the longer-term impact on wellbeing on individuals who have been subject to the traumatic effects of domestic abuse and the benefit of therapeutic services for survivors.

We have responded to this in our strategy through including an action to consult with Deaf and disabled communities and service providers representing the views of survivors of a range of disabilities including learning disabilities to improve our understanding of their needs in relation to VAWG. This Strategy

commits to ongoing engagement with these groups. We will work with partners including the NHS, the OPCC, the voluntary and community sector and local authorities to continue to fund and extend support for those with disabilities.

The strategy document itself will be produced in a range of accessible formats.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

The strategy document itself will be produced in the most accessible format available for readers with a range of disabilities.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data for VAWG services in Brighton and Hove highlights underrepresentation of people from Black and Racially Minoritised communities accessing VAWG support services. This is also evident in MARAC data where referrals are significantly lower at 3% than the Safelives estimate of 13% of referrals for our population. In this strategy we have committed to work in partnership to ensure that all those affected by VAWG including migrant victims and those from Black and Racially Minoritised backgrounds and other minoritised groups - can access help without fear, with safe and informal spaces for victims who need to seek support. Improving support for all Black and Minoritised communities in the City was a key recommendation of the Pan Sussex Domestic Abuse and Support in Safe Accommodation Strategy, 2021- 2024 and BHCC have commissioned the Domestic Abuse Black and Racially Minoritised Capacity Building Service to work at grassroots level with communities to build awareness of all the forms of VAWG and routes to safety as well as to improve confidence in the support systems available. The Police have further supported this workstream by targeting support at communities vulnerable to exploitation. Feedback from consultations highlighted the specific additional barriers for the victims and survivors who may have insecure immigration status. This includes, but is not limited to, where a person's status is being used to exert control and prevent an individual seeking support.

We have included commitments to:

- deliver awareness raising workshops via the VAWG Network on relevant legislation and areas of VAWG related to race/ethnicity including migrants, refugees and asylum seekers.
- bring a group of community Leaders together to act as critical friends to improve VAWG integration at a grassroots level with communities and faith groups. Improve confidence in the local response to VAWG, receive a high-quality services and that ethnic disproportionality is identified and addressed.
- work with the Citizens Advisory Group (CAG) to ensure their expertise is utilised in the development of Black and Racially Minoritised communities VAWG support.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Feedback from services highlights that some survivors with a faith feel that some specialist services and society, in general, are unable to understand their experiences of abuse, and their barriers to accessing support due to their religious identity, their faith community and any spiritual abuse that they may experience from their perpetrator. There were reports of survivors being retraumatised through the criminal justice process and its insensitivity to the cultural norms of the survivor.

BHCC recognises that race and religion are separate characteristics. However, the link between certain religious groups and Black and Racially Minoritised communities may mean that some religious group could encounter some of the disadvantages set out in the section above.

There may be some tensions with regard to female genital mutilation (FGM), related to the ‘demonisation’ of FGM in the UK and the cultural environment in which survivors were raised. There is a need to consider practices like FGM within an “anti-racist” and intersectional lens/framework. The Council Anti Racism Lead has delivered a VAWG Network session on FGM within an “anti-racist” and intersectional lens/framework but recent feedback from the Citizens Advisory Group has highlighted the importance of extending culturally competent VAWG training to practitioners in the Criminal Justice System Health, Housing and Social Work.

The strategy includes commitments to develop a community coordinated response to VAWG which commits to support community-based capacity building, community champions, as well as work to strengthen community-based education responses. This will be supported by the VAWG Unit, BME Capacity Building Programme delivered by Stonewater, the International Women’s Network, Hersana, RISE and Victim Support.

The VAWG Unit will continue to work with faith groups to raise awareness of VAWG/DA/SV and the support available in Brighton and Hove and will continue to challenge beliefs including cultural beliefs that underpin all forms of VAWG/DA/SV.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Violence against women has been defined by both the World Health Organisation and the United Nations as a form of discrimination: ‘violence that is directed against a woman because she is a woman or that affects women disproportionately’.

This strategy acknowledges there are significant differences between the genders in relation to victimisation and offending in gendered crimes, such as domestic abuse or stalking. Women are much more likely than men to be the victims of high risk or severe domestic abuse: 95% of those going to MARACs nationally are women. Women are also much more likely than men to be the victims of sexual violence. Men are most frequently the offender in all reported types of domestic abuse and sexual abuse.

BHCC conducted a public consultation into perceptions of safety in public spaces which highlighted that women feel less safe and sought reassurances that there would be more visible policing locally to feel safer in public spaces.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Brighton and Hove Trans Needs Assessment 2015 reported that Trans people find more barriers accessing services and are more unlikely to engage. Specialist services have told us that Trans people face additional barriers to accessing support. Barriers include: being mis-gendered by services or statutory partners, leading to further traumatisation linked to their gender identity; and, a fear of being denied access to certain services because of their transgender identity. Switchboard also highlight that Trans and non –binary persons present as needing support following experiences of harmful practices which include so-called honour violence and forced marriage.

Research by Stonewall has shown that up to 80 % of trans people have experienced emotional, sexual or physical abuse from a partner or ex-partner, and that they are unlikely to report their abuse. The research highlights a number of factors including access to appropriate service provision and lack of knowledge by professionals of how an LGBTQ+ victim/survivor may experience abuse. SafeLives (2021) found that 7% of the people accessing Sexual Violence services were transgender, indicating a disproportionate impact on this group.

There is a clear gap in data available in understanding the prevalence of VAWG for transgender and non-binary people. The available data from the Police and Housing does not tell us if survivors were trans women or trans men. It is unclear if the experience of seeking support is the same or different for trans women/men and those who identify as non-binary.

Although BHCC have prioritised support for LGBTQ+ domestic abuse survivors, there is a need to ensure this service continues to be accessible and services are promoted at community events, in housing and health settings to ensure it has the widest possible reach.

Specific areas of focus that relate to gender reassignment include improving our data collection to better understand the needs of all genders.

We will continue to commission services to work with survivors of all genders.

We will ensure our staff provide advice and guidance using to ensure that our language is appropriate language that is inclusive to gender reassignment.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Some forms of VAWG specifically DA and sexual violence predominately occur within heterosexual relationships. Our MARAC data highlights that 93% of cases are for women involved in relationships with men.

SafeLives data shows that nationally, 2.1% of cases heard at MARAC related to LGBTIQ+ victims. However, for Brighton and Hove this is much higher at 7%. This aligns with the demographics of the [City](#).

Feedback from specialist services has highlighted that homophobia and biphobia and harmful practices are perpetrated upon survivors who are LGBTQ+ and is often the reason people flee to Brighton for safety in the local community.

However, it should be noted that many survivors do not disclose their sexual orientation.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

VAWG service providers nationally reported that there was an increase in sexual violence and abuse within interpersonal relationships including within marriages and civil partnerships, particularly during the pandemic. Domestic abuse is highest amongst those who have separated, followed by those who are divorced or single. Separation is acknowledged to be a significant indicator of risk in domestic fatalities. The majority (99%) of residents of Brighton refuge are chiefly women who have separated from their partner.

VAWG services also highlight that there is a clear link between marriages/civil partnerships and migrant survivors of VAWG. Those with insecure immigration status who are resident in the UK due to a spousal visa may apply for support that gives recourse to public funds. This is not the case for those with any other type of visa.

There is a clear gap in data available in understanding the prevalence of how marriage or civil partnerships may impact upon these experiencing VAWG but the trend for domestic abuse highlights a strong correlation.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Pregnancy and maternity is known as a risk factor for domestic abuse with many victim/survivors reporting that the first incidence of violence happened while they were pregnant. In instances where an individual has multiple pregnancies in close succession this is often a sign of coerced pregnancy as a form of control.</p> <p>Pregnancy complications are also associated with FGM and there is significant research on the health complications of FGM which is often first identified at ante- natal.</p> <p>Victim/Survivors would benefit from measures to provide integrated support during pregnancy. Their risk of harm may be reduced by actions to help perpetrators of domestic abuse change their behaviours. However, it is important that the ways these measures are implemented are sensitive to the needs of women in certain BME communities, who are less likely to access appropriate screening and referral to appropriate domestic abuse support. Pregnant people once identified as affected by VAWG should be provided with support and safe accommodation where appropriate.</p> <p>BHCC will work with Public Health, a communication strategy/infogram on the new duties for local authorities because of the Domestic Abuse Act which should include information on support.</p> <p>Our data collection does not provide sufficient information on Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum) to understand the extent of the impact of VAWG .</p>

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

There is insufficient local information on this category.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Immigration status is often used to coerce victim/survivors of all forms of VAWG. The impact of VAWG is compounded by insecure immigration status in that their access to support can be limited by their Immigration status particularly those with no recourse to public funds (NRPF). However, although those with children may be supported due to Section 17 of the Children’s Act. Those without children are impacted by lack of access to public funds which affects eligibility and access to social housing. Feedback from consultations for the VAWG Strategy highlights there are gaps in access to support for expatriates, migrants, asylum seekers and refugees.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

There is insufficient information to confirm a disproportionate impact on carers. However, Carers intersect with all protected characteristics.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

YES

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Domestic Abuse is a prevalent factor in Children’s Social Care assessments and is a factor in decisions to refer families to parenting programmes and in decisions to remove children from their parents.

The experience of being care or foster experienced is an additional risk factor for exploitation. Key findings from the Care Journey/SafeLives highlighted that the support for young people in the care system was inadequate in relation to support with recovery from domestic abuse, other adverse childhood experiences and support in forming healthy relationships.

Contract monitoring for VAWG services now includes Care Leavers as a protected characteristic category and there will be a better understanding after a longer period of monitoring the impact on those with being care or foster experienced.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Experience of any form of VAWG will impact on the stability of the victim/survivors housing situation with many people becoming homeless. The Domestic Abuse Act 2021 brought in a new statutory duty for Tier One Local Authorities to provide support in safe accommodation. BHCC have commissioned a range of new services to discharge this duty based on the recommendations of the Pan Sussex Safe Accommodation Needs Assessment.
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6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This category is the subject of this EIA. See other points
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6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In general women who have been affected by all forms of VAWG are more affected by poverty than their male peers: families affected by deprivation disproportionately are headed by lone parents most of whom are women, and these women are more likely to be unemployed which means they will be reliant on benefits and there is an issue relating to affordable rent/.
Measures to tackle poverty in the City should target victims/survivors positively and include actions relating to housing options, income maximisation and, management of debt and schemes to make work more accessible should reference the needs of those affected by VAWG. However, it should be noted that all VAWG victim survivors are likely to experience some socio – economic disadvantage and this

should be considered in financial assessment and include coerce debt. Nationally, the work of Surviving Economic Abuse (SEA) nationally has brought economic abuse to the attention of banks and building societies. Going forward we will see to incorporate awareness of economic abuse into our monitoring framework to better understand the extent of the problem locally.

People who have been affected by domestic abuse are more affected by poverty than their male peers: families affected by deprivation disproportionately are headed by lone parents most of whom are women, and these females are more likely to be unemployed which means they will be reliant on benefits and there is an issue nationally relating to affordable rent. Measures to tackle poverty in the borough should target those affected by VAWG positively and include actions relating to housing option, income maximisation and, management of debt and schemes to make work more accessible should reference the needs of those affected by VAWG.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

VAWG is recognised as a Human Rights issue and BHCC are committed to ensure that all survivors are able to seek support to live safe lives.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Research for the Strategy highlights the benefits of developing a coordinated community response to ensure that everyone has a role to play in tackling VAWG. We will continue to work with communities, partners and the criminal justice system to ensure that those who cause harm are held to account and victim/survivors are supported to safety. By ensuring the system is robust we aim to prevent harm at an earlier stage.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

The Council will undertake the following SMART actions to address the disproportionate and cumulative impacts of VAWG in relation to the priorities of the Preventing VAWG Strategy:

A stronger coordinated community response.

- We will create a new VAWG Governance and delivery framework to lead the development, delivery, and scrutiny of the VAWG Strategy and annual action plans. The VAWG Oversight Board will be made up of community, statutory and voluntary sector leads
- We will ensure that experts by experience are part of the ongoing development, delivery, and scrutiny of the VAWG Strategy and undertake focus groups with survivors in the community. We will draw upon those who have lived experience, and we will support them to ensure their involvement is trauma informed and does not lead to re-traumatisation.
- We will strengthen our local Community Coordinated response by the following:
- We will continue to deliver and develop a tiered workforce development programme to build knowledge, skills, capacity, culturally relevant and appropriate responses. This will include multi agency training with statutory services such as police, social care, housing and health.
- We will continue to conduct Domestic Fatality Reviews and contribute to Child Safeguarding Practice Reviews and Safeguarding Adults Reviews (where there are links to VAWG) to identify and share learning and create action plans to ensure sustainable change. (VAWG Unit/ Adult and Children's Learning and Development Groups)
- We will work in partnership to identify intersecting inequalities for those experiencing multiple disadvantages, to ensure services address the connections between VAWG, discrimination, substance dependency, mental ill-health, involvement in the criminal justice system particularly for those involved in prostitution. (Community Safety Partnership, Adult Safeguarding)
- Inclusivity and intersectionality will be woven throughout our approach to VAWG. Our response will reflect acknowledge survivors of all genders but reflect that women and girls with other protected characteristics – including those who are disabled, of minoritised ethnicities, LGBTQ+ , and experiencing homelessness are at even greater risk of violence (Corporate Plan).
- We will undertake a review of the needs of those affect by VAWG with protected characteristics via a series of focussed workshop events in 2025//26 (VAWG Team/Equalities)
- We will ensure that directorates across the Council contribute to the delivery of the strategy workplan, this will include Adults and Children's Services, Community Safety, Housing, Licensing Public Health and Public Space work. DA Policy (Council Plan).
- We will strengthen our public safety work with particular reference to developing a strong response via Licensing, transport and the nighttime economy (Licensing). We will ensure that services across partnership will understand the links between VAWG, serious youth violence, contextual harm, and modern slavery and are able to provide a safe and supportive response (Children's Services).
- We will align our work with national, regional, and local developments to ensure that new policy and legislation is adopted periodically throughout the life of the strategy.
- We will collaborate with regional partners to support the strengthening of the criminal justice response to VAWG with specific reference to the implementation of the Domestic Abuse Act 2021 and systemic reform within the Criminal Justice System for those affected by sexual assault (Community Safety Strategy).

- We will work with community groups including the Citizens Advisory Group (CAG) to strengthen our response recognising that those from minoritised communities are underrepresented in local VAWG data. (Equalities/VAWG Team)
- The Council will ensure that future VAWG commissioning is robust and trauma informed services includes social value weighting.
- We will work with Procurement to review the effectiveness of the domestic abuse considerations in all Council contracts (Procurement).
- We will increase our White Ribbon Ambassadors and Champions to improve awareness of domestic abuse across the partnership (VAWG Unit).

Prioritising prevention

- We will develop a media and communication campaign to involve the community /role in preventing harm (Corporate Communications)
- We will work with partners to ensure there is a shared understanding of risk in relation to VAWG and particularly DA (VAWG Unit/Workforce development).
- We will strengthen VAWG prevention work in educational settings to educate young people about VAWG. This will not be limited to schools but will include the community settings that young people attend including faith groups, youth drama and theatre providers, sport and wellbeing provision (Education)
- We will create opportunities for disclosure and support through co-locating specialist VAWG workers in mainstream services (Commissioning).
- We will continue to work with Health to increase identification of VAWG at an earlier stage in Health settings (ICB).
- We will improve our approach to digitally enabled abuse and the coordinate campaigns to promote Safety Apps (Community Safety Partnership)

Supporting Survivors

- We will continue to commission a range of trauma informed services for those affected by VAWG ensuring support for all survivors across all risk levels and all genders including those with protected characteristics (VAWG Commissioning)
- We will commit to continue to provide support in safe accommodation for survivors in line with the Domestic Abuse Act 2021 (VAWG Commissioning).
- We will explore opportunities to explore how to improve support for children and young people affected by VAWG (Children's Service/VAWG Unit).
- We will develop a "men in sheds" approach to tackling male victimisation through developing groups where men can safely disclose (VAWG Unit/ICB)
- Where appropriate we will continue to collaborate and joint commission with the ICB and OPCC in line with the forthcoming Victims and Witnesses Act (VAWG Commissioning/Community Safety)
- We will continue to quality assure the Brighton and Hove MARAC via the MARAC Steering Group to ensure the MARAC continues to operate to national standards (Community Safety).
- We will work with Commissioners at the ICB to improve the response to survivors with particular reference to the identification of those who are disabled. MARAC data consistently shows that over 30% of high-risk victims have additional needs linked to disability (VAWG Unit and ICB Commissioners).
- We will review how we support survivors who have no recourse to public funds/refugee status (VAWG Unit/Equalities Team)
- Partners across the criminal justice system and offender support services will work in partnership to raise awareness and respond to the links between a survivor's unique experiences of domestic abuse, sexual violence and offending linked to multiple disadvantage and removal of children (Community Safety Partnership).
- We will continue to work with the Integrated Care Board to ensure that Health providers are at the forefront to identify victims at an early stage and ensure Health staff have the relevant skills and information to signpost survivors to safety (Health and Wellbeing Board).

- During the life of this strategy, we will work with the Business sector to develop opportunities to ensure local business are part of the response.
- We will incorporate the work of Surviving Economic Abuse in our CCR to ensure survivors are aware of which banks have signed up to supporting those affected by economic abuse (Community Safety Partnership).

Building an accountable community and changing perpetrator behaviour.

Improve how perpetrator behaviour is addressed both by strengthening the criminal justice response and supporting behavior change programmes

Improve data monitoring and collection (including lived experience of diverse survivors) and continuously develop a nuanced understanding of VAWG and impacts for different vulnerable and disproportionately impacted groups based on this EIA (covered in the VAWG Strategy and implementation action plan)

1. Implement a robust, consistent data collection system across all services
2. Create standardised, trauma-informed assessment tools
3. Regularly review and update data collection methods
4. Ensure anonymity and confidentiality in data gathering, encouraging understanding around data provision and use to enable more people to volunteer sharing of sensitive data around their identities with services

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

This strategy will contribute to working with communities to prevent and tackle abuse. The VAWG Unit will be responsible for implementation of the strategy and action plan which will be part of the service plan.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	x
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The Cabinet Report January 2025 report highlights considerations informed by this EIA. These are summarised below:

Public consultations revealed significant safety concerns, due to sexual harassment, particularly at night, and the need for improved support and respect for dignity for those with lived experiences of VAWG, alongside a balanced provision of services to meet the needs of a diverse city like Brighton. The EIA highlights the need for a co-ordinated community response to VAWG, DA, and SV, with the support of key statutory partners with a focus on prevention, support for survivors, and accountability for perpetrators.

It is important to address funding reduction implications for those impacted, particularly for joint commissioning, and recognise the disproportionate impact on women and girls, alongside gender normativity, inequality and intersectional impacts. Intersectional considerations and an inclusive approach are important so that we do not minimise how VAWG, DV ad SV have an additional impact on top of age and gender when there are additional layers of impact being disabled, from a migrant or socio-economically vulnerable, Black and non-White-presenting Minoritised Ethnic background, and LGBTQIA+, especially Trans, Non-Binary, and Intersex people. The strategy and EIA outline several recommendations and mitigating actions, including various statistics and layers of impacts for the cabinet to consider in provision of services.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Anne Clark, Strategic Lead Commissioner Domestic Abuse and VAWG	17-Dec-24
Accountable Manager:	Jim Whitelegg, Interim Head of Safer Communities	17-Dec-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	18-Dec-2024
EDI Manager:	Sabah Holmes	18-Dec-2024, reviewed further 23-Dec-24
Head of Communities, Equality, and Third Sector (CETS) Service: <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

VAWGDA SV Brighton & Hove Oversight Board:

Terms of Reference

Terms of reference for the Violence against Women and Girls, Domestic Abuse and Sexual Violence (VAWGDA SV) Brighton & Hove Oversight Board.

Role and purpose

The Oversight Board provides a collaborative oversight to support the progression and delivery of the Brighton & Hove VAWGDA SV Strategy 2025 to 2028 at pace and with momentum.

The Oversight Board will align scrutiny of performance to the activities driven by the Brighton & Hove VAWGDA SV Strategy and action plan, and associated workstreams.

The Board's vision is to end violence against women and girls, domestic abuse and sexual violence in Brighton & Hove. The Board will achieve this ambition through a commitment, alongside local partners, to deliver the strategic aims of the VAWGDA SV 2025-2028 Strategy collaboratively.

The VAWGDA SV Strategies aims are to:

1. **Strengthening the co-ordinated response** to all forms of VAWG, DA and SV irrespective of whether the incident occurs in private or public space, we will join up council and partner services and address gaps in provision.
2. **Prioritising prevention** to end VAWG, DA and SV through a collaborative approach to awareness raising, data and information sharing, education and communication campaigns.
3. **Supporting survivors** to ensure anyone affected by VAWG, DA and SV has access to high quality trauma-informed support. Working across public, private and third sector partners, with specialist and community providers, we will identify and support victims at an earlier stage.
4. **Building an accountable community and changing perpetrator behaviour** by shifting the focus away from the victim's behaviour to the perpetrator's, strengthening the criminal justice response and supporting behaviour change.

The Board will contribute to these aims through multi-agency co-operation and commitment to each other. Multi-agency includes third sector delivery agencies, it involves representative voices, and it involves survivors.

Action plan:

For the full list of actions related to the strategic aims please see the appendix 1

The role of the Board is to:

- hold partners to account
- secure buy in and commitment of partners
- foster effective partnership working between key partners
- ensure engagement and involvement of all partners in the development and delivery of the Strategy and action plan
- ensure that all stakeholder, including survivor, views are understood and considered as part of the development and delivery of the approach to VAWGDASV
- provide a regular forum for partners to discuss and advise on policy development and proposals for the delivery of the strategy and action plan

In the Board meetings, the group will:

- adopt a collaborative and constructive approach to ending VAWGDASV recognising the roll of all parties in achieving that aim
- represent the views of their organisation in relation to development and delivery of the Strategy and action plan, offer mutual accountability through the open sharing of information including performance measures and make commitments for action to be delivered by their organisation
- provide oversight to an agreed programme of work (conducted by working groups) to deliver the shared objectives and aim to end VAWGDASV in Brighton & Hove

Decision Making

The Board does not mandate partners with any specific decision. Each organisation has its own accountability mechanism. However, there remains considerable space for collaborative agreement to be achieved through common purpose and commitment. It is in agreeing and delivering on shared approaches that the Board will optimise the collective contribution to the aim to end VAWGDASV.

Task and Finish Groups

The Board will oversee a series of Task and Finish Groups, which will report to the Oversight Board, to take forward and oversee work on key actions. These workstreams may change over time as progress is made and priorities develop. However, initially the task and finish groups will address each strategic objective:

1. Community Coordination
2. Prevention

3. Survivor Support
4. Perpetrator behaviour change

Membership and roles

The Board meetings will be co-chaired by XX in Brighton & Hove. Membership should be at a sufficiently senior level that they are able to make commitments on behalf of their agency.

Co-Chairs

Head of Community Cohesion or Director of Communities and Commissioning TBC

Police Lead. TBC

Senior responsible Officers

Head of Cohesion. TBC

Anne Clark, Strategic Lead Commissioner, Violence Against Women and Girls, Domestic Abuse and Sexual Violence

Core members

Brighton and Hove City Council.

Tom Bennet. Lead for Exploitation and Serious Violence

Nahida Shaikh. Prevent Lead

Justin Grantham. Head of Safeguarding

Harry Charles. Head of Homelessness

Martin Reid. Director of Housing.

Public Health. TBC

Equalities. TBC

Chas Walker. Changing Futures Lead

Guy Sargeant. Adult Safeguarding Bard Manager

Shahida Akhtar. Partnership and Strategy Officer and MARAC Lead

Tess Michaels. Partnership and Strategy Officer

Fire Service. TBC

Police. TBC

Probation. TBC

Integrated Care Board. Nicole Nair, Strategic Commissioner

Integrated Care Board. Jenny Whytte, Safeguarding Lead

Victims of Lived Experience Board. Sarah Flagg

Office of the Police and Crime Commissioner. Jason Tingley

Voluntary Sector/Providers

Brighton Womens Centre, Lisa Dando

Cranstoun. Maria Cripps

CGL. TBC

Hersana. TBC

LGBT Q+ Switchboard. Head of Services Luke Martin

Network of International Women. Linda Beanland

Stonewater. Nicola Lambe, Head of Domestic Abuse

RISE, Jo Gough, CEO

Victim Support. Alan Chambers

Task and Finish Group Leads

Coordinated Response Group. BHCC Anne Clark Strategic Lead for VAWG/DA/SV

Prevention. BHCC Justin Grantham Head of Safeguarding

Supporting Survivors Disadvantage. Brighton Womens Centre Lisa Dando TBC

Perpetrators. Cranstoun. Colin Fitzgerald. Head of DA Services

Meetings

Meetings will convene every 2 months and will last for 2 hours. This may be subject to change, and additional meetings may be brought forward at the discretion of the members.

Appendix 1: VAWGDASV Action Plan

Priority one: A strengthened Community Coordinated Response

No	Action	Intended Outcome
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1.1	Develop a revised governance and subgroup structure to deliver the VAWG, DA and SV Strategy, with quarterly reporting to the VAWG, DA and SV Oversight Board.	Establish a revised governance and subgroup structure to support the effective delivery of the Strategy, with quarterly progress reports provided to the VAWG, DA, and SV Oversight Board to ensure accountability and strategic alignment.
1.2	Disseminate Learning from Domestic Abuse Related Death Reviews (DARDR) to improve future service delivery and risk management	Share insights from Domestic Abuse Related Death Reviews (DARDR) across relevant services to enhance future service delivery and strengthen risk management practices, promoting a more informed and preventative approach to domestic abuse cases.
1.3	Institute mandatory VAWG, DA and SV Awareness training as part of induction for all Brighton & Hove City Council (BHCC) staff, ensuring that all employees are equipped to recognise, respond to, and signpost disclosures of VAWG, DA and SV	Implement mandatory VAWG, DA, and SV Awareness training as part of the induction process for all Brighton & Hove City Council (BHCC) staff, equipping employees with the knowledge to recognise, respond to, and appropriately signpost disclosures of violence against women and girls, domestic abuse, and sexual violence.
1.4	Expand action focused on improving safety in Public Spaces, with special focus on public transport, schools and libraries	Enhance safety measures in public spaces, prioritising public transport, schools, and libraries, to create secure environments where residents feel protected and supported, with targeted actions to prevent VAWG, DA and SV and respond to potential risks effectively.
1.5	Work with highways and planning to continually improve street lighting and ensure VAWG, DA and SV considerations are included in the City Plan, planning applications to build environment and public spaces.	Partner with highways and planning teams to enhance street lighting and incorporate VAWG, DA, and SV considerations into planning applications, ensuring that public spaces and the built environment are designed to prioritise safety and prevent violence.
1.6	Continue to support Operation Limelight Activity, aimed at raising awareness of Female Genital Mutilation (FGM) and other harmful practises	Maintain support for Operation Limelight activities to raise awareness of Female Genital Mutilation (FGM) and other harmful practices, enhancing public knowledge and preventative efforts within the community.

Priority two: Prioritising Prevention

No	Action	Intended Outcome
2.1	Develop links with young ambassadors and advisory groups to co-produce events and campaigns aimed at raising VAWG, DA and SV awareness among young people.	Improved engagement with young people in decision-making processes related to VAWG, DA AND SV campaigns and events.
2.2	<p>Encourage venues in Brighton & Hove to adopt a commitment to VAWG, DA and SV prevention in the new Brighton & Hove licensing policy.</p> <p>This will include action on spiking, VAWG, DA and SV training for staff around identifying and acting on inappropriate sexualised behaviour and offending with regular reviews being undertaken</p>	Promote the adoption of a VAWG, DA, and SV prevention commitment within Brighton & Hove's licensing policy for local venues, including measures to address spiking, staff training on identifying and responding to inappropriate sexualised behaviour, and regular policy reviews to ensure ongoing compliance and effectiveness.
2.3	Explore joint working initiatives with the ICB (Integrated Care Board) and /Public Health team to prevent VAWG, DA and SV in maternity services, sexual health services and community services and GPs	Explore collaborative initiatives with the Integrated Care Board (ICB) and Public Health team to prevent VAWG, DA, and SV within maternity services, sexual health services, community services, and GP practices, fostering a coordinated approach to early intervention and support across healthcare settings.
2.4	Strengthen interventions for individuals with multiple disadvantages who are at greater risk of experiencing violence against women and girls VAWG, DA and SV by identifying gaps, reducing duplication of efforts, and fostering interagency collaboration.	Strengthened, coordinated interventions for clients with multiple compound needs through collaborative, innovative approaches and improved resource allocation. The approach aims to provide earlier and more effective support to prevent VAWG, DA, and SV among vulnerable groups by addressing gaps and reducing duplication across agencies.
2.5	Strengthen the offer to education sector to raise awareness of VAWG, DA	Improved pathways to support for young people by integrating VAWG, DA and SV into school environment.

	and SV amongst young people, using a “whole school approach” and the work of the Harmful Sexual Practises Group. Include considerations of the adultification of young black girls and link VAWG, DA and SV awareness to anti-bullying work.	Delivery of VAWG, DA and SV related education programmes, ensuring young people are educated on the impact and prevention of VAWG, DA and SV.
2.6	Support the Family Hubs to share information on VAWG, DA and SV and provide a consistent process for disclosing information to protect those at risk of harm.	Increased safety for individuals at risk of VAWG, DA and SV through better information sharing and consistent processes for disclosure in Family Hubs.

Priority Three: Support for Survivors

No	Action	Intended Outcome
3.1	Monitor the impact of key criminal justice system changes on VAWG, DA and SV including the early release of prisoners, the introduction of specialist Domestic Abuse (DA) courts in Sussex, developments from Operation Soteria (focusing on rape and sexual offences), and the ongoing work of the Stalking Clinic.	Local VAWG, DA and SV response is continually informed by the latest criminal justice developments and evaluation of service providers and partners are fully informed on criminal justice system trends and policy changes, allowing for more responsive and adaptive services.
3.2	Hold twice yearly workshops with individuals who have lived experience of VAWG, DA and SV to consult on key issues, gather feedback on local services, and ensure that a wide range of victim experiences are represented.	Organise workshops with individuals who have lived experience of VAWG, DA, and SV to consult on key issues, collect feedback on local services, and incorporate diverse victim perspectives, ensuring that service improvements and strategies are responsive to the needs of those affected.
3.3	Develop a comprehensive VAWG , DA and SV Information Pack specifically for the Housing Team,	Victims/Survivors are better informed of their housing and safety options, allowing them to make informed decisions and access appropriate support.

	providing victims with clear knowledge of their housing options and available support.	
3.4	Monitor the implementation of the recommendations of the Stonewater Safehaven by the Sea Report	Establish a monitoring framework to oversee the implementation of recommendations from the "Safe Haven by the Sea" report, ensuring that actions are effectively executed and contribute to enhancing support services for domestic abuse survivors in Brighton & Hove
3.5	Collaborate with the Business Community to improve access to support for survivors Including employees and members of the public.	Partner with the business community to improve access to support for survivors of VAWG, DA, and SV, ensuring that both employees and members of the public are aware of available resources and support services, and fostering safer workplaces and community spaces.
3.6	Review gaps in provision related to disability due to evidence from data which highlights high levels of victim survivors with disabilities and VAWG, DA and SV intersect	Conduct a review of service provision gaps for survivors with disabilities, using data insights that indicate high levels of VAWG, DA, and SV within this group. This review will inform targeted improvements to ensure accessible, inclusive support for survivors with disabilities, addressing the specific challenges where disability intersects with experiences of violence and abuse.
3.7	Ensure that VAWG, DA and SV is referenced and integrated into the Violence Reduction workplan to meet legal obligations and ensure VAWG, DA and SV is a core focus in broader violence reduction strategies	Integrate VAWG, DA, and SV into the Violence Reduction workplan, ensuring that these areas are prioritised and aligned with legal obligations. This will make VAWG, DA, and SV a core focus within broader violence reduction strategies, fostering a comprehensive and inclusive approach to community safety.
3,8	Continue to support the development of Reciprocal Housing Arrangements	Work with Housing and partners across Sussex to develop Reciprocal Housing Arrangements to support survivors to maintain tenancy status in line with Domestic Abuse Act 2021

Priority four: Building an accountable community and changing perpetrator behaviour

No	Action	Intended Outcome
4.1	Work with communities via forums and public events to change the culture and beliefs that underpin VAWG, DA and	Improved understanding of VAWG, DA and SV within communities, with a shift in cultural norms and beliefs that contribute to VAWG, DA and SV

	SV using education and awareness to shift attitudes	
4.2	Support Sussex Police to offer behaviour change interventions at the Custody Suite, ensuring earlier stage interventions to address abusive behaviour	Perpetrators are offered an intervention to change behaviour at an earlier stage, reducing risk of future harm.
4.3	Work with Children's Services to collaborate and develop policies and processes in place for assessing and working with perpetrators of domestic abuse and other forms of VAWG, DA and SV when safeguarding children and the non-abusing parent.	Improved practitioner response to safeguarding risks and better understanding of abusive or neglectful parenting in VAWG, DA and SV contexts. Dissemination of information to change the beliefs that underpin VAWG, DA and SV.
4.4	Scope and develop a Men in Sheds initiative locally at Jubilee Library to educate men on perpetrator behaviour and increase awareness of support services for male victims.	More male victims of VAWG, DA AND SV can come forward to be supported.
4.5	Continue to fund behaviour change programmes including adults, young people, and LGBTQ+ perpetrators, ensuring long-term support for behaviour change.	Behaviour change programmes are accessible for all perpetrators, with a focus on sustainability and addressing diverse needs, including LGBTQ+ perpetrators.
4.6	Support the forthcoming Safer Streets programme	The Government has confirmed that the Safer Streets programme will be the funding for their delivery of their mission to halve VAWG, DA and SV in 10 years. Details to be announced but previous funding has linked to safety in public spaces and limiting perpetrator's ability to act in public spaces

Brighton & Hove City Council

Cabinet

Agenda Item 140

Subject: Trans Inclusion Schools Toolkit Version 5

Date of meeting: Thursday, 23 January 2025

Report of: Cabinet Member for Children, Families, Youth Services
and for Ending Violence against Women and Girls

Contact Officer: Name: Corporate Director for Families, Children and
Wellbeing

Email: deb.austin@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or
working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 The Trans Inclusion Schools Toolkit supports schools and education settings to develop policies and practice that promotes the welfare of some of the most vulnerable children and young people in the city.
- 1.2 The toolkit aligns with the Council Plan 2023-27. In particular, Outcome 3 A healthy city where people thrive – Keep children and young people safe and ensure no child or family is left behind

2. Recommendations

- 2.1 Cabinet agrees to publish the Trans Inclusion Schools Toolkit Version 5 (appendix 1) and recommends all education settings in Brighton & Hove use its guidance to inform policy and practice.

3. Context and background information

- 3.1 Trans young people have consistently been identified both locally and nationally as highly vulnerable in terms of health and education outcomes. Brighton & Hove City Council have recognised this, and since 2013, has published guidance for schools and education settings to support trans and gender questioning children and young people to access education services successfully.
- 3.2 This guidance and advice has been recognised by many other councils, the NHS, schools and education settings both within and outside the city as

providing crucial guidance and support for school leaders, teachers and staff working in education settings.

3.3 Since its inception, the council has recognised that given the changing nature of this area of policy, it needs to remain subject to review. This is the fifth version of the toolkit to be published.

3.4 There have been several publications over the past 12 months which address the issue of gender identity and gender questioning/trans children and young people. These include:

- Consultation on draft non statutory Guidance for Schools and Colleges: Gender Questioning Children (March 2024) – outcome awaited
- the Independent Review of Gender Identity Services for Children and Young People (The Cass Review April 2024)
- Draft statutory guidance for Relationships, Sex and Health Education (May 2024) – outcome awaited
- Updated statutory guidance on Keeping Children Safe in Education (Sept 2024) which references the awaited Gender Questioning Children consultation

3.5 The toolkit has been reviewed with these policy statements in mind to provide schools with a useful tool they could use to help them support trans and non-binary students.

Consultation response

3.6 An extensive online consultation process was undertaken as part of the review of the Toolkit. This included engagement sessions involving local schools to gain the views of young people; a Your Voice consultation exercise which captured 448 responses; written responses and focus group sessions.

3.7 A summary of the consultation response is detailed in appendix 2. In addition, all full responses to the online consultation are provided to the Cabinet as background papers.

3.8 Analysis of the consultation responses indicates a range of opinions, with a majority either in support of the toolkit or feeling it should be going further to promote and safeguard the rights of trans and non-binary children.

3.9 216 parents and carers engaged in the consultation, 158 of which have a child attending a school in Brighton & Hove. 51% of Brighton & Hove parents agreed with the principles of the toolkit, and 3% stated they did not think it supported trans children enough. Of all parents and carers who responded to the survey, 48% agreed with the principles and 2% stated they did not think it supported trans children enough. This pattern was broadly repeated across the different elements of the toolkit.

- 3.10 Seventy responses were received from young people. Overall, young people were supportive of the principles of the toolkit, with the main contention being the involvement of parents and carers. Feedback included views that young people should have the right to explore their identity without the involvement of their parents, and that the toolkit did not go far enough in its support of trans children.
- 3.11 56% of teachers were in support of the toolkit's principles. A significant number of teachers felt the toolkit was not bold enough in its aims or advice (15%).
- 3.12 Respondents from outside the city were more likely to be negative about the toolkit with 44% arguing against the new version, with 20% in favour.

Changes in the new version

- 3.13 The new draft of the toolkit has involved extensive updating. It has been refreshed to identify the different issues that schools and education settings can face, citing relevant material to help inform schools of the factors they need to consider when adopting a fact specific nuanced approach.
- 3.14 The toolkit remains focused on supporting schools on how to support trans and non-binary children and young people. The toolkit emphasises that schools are not, and should not, be advising or giving advice about medical transition.
- 3.15 All references to statutory and legal guidance have been updated in the revised toolkit.
- 3.16 It emphasises that the approach of the school or setting to each student needs to be considered on a case-by-case basis, in partnership with parents or carers(except in exceptional circumstances when it would be unsafe to do so) , placing the wellbeing of the child at the centre of decision making.
- 3.17 Schools may well have to navigate situations with children and young people who are exploring social transitioning, as defined in the Toolkit. How they respond to these situations can have a significant impact on the young person's health and wellbeing. Whilst the Cass Review is primarily directed at NHS services, it does have some relevance for schools, in terms of the social transitioning element of the advice and is referenced in the Toolkit. The Toolkit does not prescribe what decisions should be made in each case but provides a framework of issues to consider.
- 3.18 Social transitioning & sharing of information with parents remains the most contentious area (and the most nuanced and complex for schools to get right). The latest version of the toolkit provides advice and support in this area, and signposts the importance of seeking further professional support (which could be from council teams) where appropriate.
- 3.19 The toolkit remains guidance – it is for schools to apply as they see fit in accordance with their ethos and values, applying their knowledge of their

students and families. It is hoped that schools and education establishments will continue to find the toolkit useful, particularly in the absence of national guidance.

4. Analysis and consideration of alternative options

Removal of the toolkit

- 4.1 This option would remove the support and advice that currently exists for schools within the city in responding to trans and non-binary children.,. Schools could look elsewhere at other toolkits, but these might be similar to the Brighton & Hove toolkit (many have been adapted from it) but will not necessarily have been comprehensively refreshed considering recent government guidance. Schools could be forced to develop their own policies and practices, which could take a wide variety of forms and lead to significant confusion and a lack of appropriate support for children and young people. The lack of national guidance may lead to some schools ignoring or indirectly discriminating against trans children and young people.

Wait for national guidance to be agreed.

- 4.2 It is unclear when national guidance for schools around supporting trans children and young people will, if ever, be issued. The consultation on the non-statutory draft guidance issued under the previous government closed in March 2024, and there has been no indication of timescales when revised guidance will be issued.

Recommend alternative guidance

- 4.3 Whilst other guidance and toolkits do exist, these will not necessarily have undergone the same level of professional scrutiny as our local guidance, thereby potentially opening schools, settings or the council to risk, following poor practice.

5. Community engagement and consultation

- 5.1 Public consultation was carried out through Your Voice. This was open for feedback from 23rd July 2024 to the 11th October 2024.
- 5.2 448 responses were received through the platform and several separate written responses.
- 5.3 Consultation engagement events were held for school staff, governors and young people. This provided a forum for questions and answers around the toolkit's aims and proposals.
- 5.4 Consultation events were also held for parents/carers of trans children and young people.
- 5.5 All responses to the toolkit have been provided as a background document.

6. Financial implications

- 6.1 There are no clear direct financial implications linked to the recommendation to publish the toolkit.

Name of finance officer consulted: Steve Williams Date consulted
09/01/2025

7. Legal implications

- 7.1 The content of the revised Brighton and Hove toolkit has been the subject of extensive input and review by the legal department. The final version of the toolkit now appended has also been the subject of independent legal advice and sanction by King's Counsel.
- 7.2 A child can have the "protected characteristic" of gender reassignment, Section 7 of the Equality Act 2010. Section 7(1) of the Equality Act 2010 states:
"A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex."
- 7.3 Where children are recognised as having the protected characteristic of gender reassignment, they must not be the subject of treatment, which is discriminatory, arising from their status as a trans child or young person.
- 7.4 As indicated in the body of the Toolkit, the Toolkit operates as guidance available to be considered by support staff and governors in Brighton and Hove schools to make informed decisions about how to promote the welfare of students who are gender exploring or meet the definition of being transgender, while at the same time taking account of how any decisions they make in that regard may impact on other pupils.
- 7.5 The Toolkit is not intended to be prescriptive or exhaustive. It does not restrict the discretion of Headteachers and Governing Bodies to make their own decisions.
- 7.6 The draft *Gender Questioning Children: Non-statutory guidance for schools and colleges in England*, published under the previous government, is not yet adopted, and in consultation responses was widely considered to be legally flawed in relation to some elements, notably as identified in the consultation response of the Equality and Human Rights Commission.
- 7.7 The Toolkit does not supersede any statute or issued statutory guidance in relation to the obligations of schools to their students and their families.
- 7.6 Schools are encouraged to always seek further professional advice if needed, which could be from Brighton & Hove City Council.

Name of lawyer consulted: Natasha Watson, Head of Law Date consulted: 06/01/2025

8. Equalities implications

- 8.1 There has been regular communication between the toolkit team and the EDI team throughout this process. The EIA in appendix 3 has been completed based on the review and engagement activities.

9. Sustainability implications

- 9.1 Not applicable.

10. Health and Wellbeing Implications:

- 10.1 Trans CYP remain one of the most vulnerable groups in the city (as seen in the SAWSS) Anecdotal and engagement activity shows that the toolkit is helping the health and wellbeing of CYP in the city.

Other Implications

11. Procurement implications

- 11.1 Not applicable.

12. Crime & disorder implications:

- 12.1 Not applicable.

13. Conclusion

- 13.1 It is recommended that the Trans Inclusion Schools Toolkit Version 5 is approved for publication and for sharing with schools and colleges in the city. This is to support trans and gender questioning children and young people to receive the support they need to be able to fully access educational services and achieve their full potentials. Without access to guidance, a vulnerable group of pupils are at risk of being left without effective support. Likewise, schools and settings are left without clear guidance leaving them to navigate a complex area of policy without support.

Supporting Documentation

1. Appendices

1. The toolkit – new revised version
2. Consultation summary
3. Equality Impact Assessment

2. Background documents

1. Consultation responses

Trans Inclusion Schools Toolkit 2024

A guide to supporting trans children and young people in education settings.

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1 Introduction

1.1 Brighton & Hove City Council commitment to equality and inclusion

1.1.1 Brighton & Hove City Council's commitment to equality and inclusion is unwavering.

1.1.2 Our vision is for a more equal city where no one is left behind. Everyone deserves to be valued and treated with respect.

1.1.3 In formulating the Trans Inclusion Toolkit, and our Equality and Inclusion Strategy, we have had due regard to the need to eliminate discrimination, foster good relations and promote equality of opportunity between *all* protected characteristics, in accordance with the Council's Public Sector Equality Duty under section 149 Equality Act 2010. We want our schools to support trans and gender diverse children and young people to thrive in their education and we know that trans children and young people can face additional barriers to feeling included and comfortable at school.

1.1.4 This Toolkit has been produced to support staff and governors in Brighton and Hove schools to make informed decisions about how to promote the welfare of students who are gender exploring or meet the definition of being transgender while at the same time taking account of how any decisions they make in that regard may impact on other pupils. The Toolkit is not intended to be prescriptive or exhaustive. Headteachers and governing bodies must continue to take decisions that they consider are in the best interests of all students and staff at their school. Schools are encouraged to always seek further professional advice if needed, which could be from Brighton & Hove City Council (TransToolkit@brighton-hove.gov.uk).

1.1.5 We understand that social and political contexts and landscapes change over time. Therefore, we remain open to learning from schools, different communities, new research, new case law, and best practice and use this to continually review our practice to ensure it remains relevant and up to date. The toolkit will therefore remain subject to future review.

1.2 Underlying principles and messages in the toolkit

- This Toolkit is guidance which aims to assist schools to make informed decision in respect of the individual circumstances of their students. It is not intended to be prescriptive. It does not restrict the discretion of Headteachers and Governing Bodies to make their own decisions. It does not supersede any statute or statutory guidance in relation to the obligations of schools to their students and their families.
- The Toolkit is intended to offer practical assistance to schools. It does not seek to provide a complete and comprehensive account of the law or a detailed legal analysis. Schools should familiarise themselves with the applicable legal regime and should seek advice if they are unsure about the legality of their policies or about what decisions to take in relation to individual children.
- Education settings and schools should develop effective equality and anti-bullying policies and practices across all protected characteristics of the Equality Act 2010 and in line with the values and ethos of the setting.
- Representation of diversity in schools prepares children and young people for life in modern Britain.
- The prevention of gender stereotyping, sexism, homophobia and biphobia is central to reducing and preventing transphobia.
- Transphobia and bullying contribute to poor mental health outcomes for trans children and young people.
- Non-conformity to gender stereotypes, or a child exploring their gender child does not mean that a child or young person is or will be trans.
- Identities are developing throughout childhood and adolescence and into adulthood, and some children and young people may explore and express their gender identity in different ways. This can start from a young age and may change over time.
- Support for individual trans children and young people should generally be provided on a case-by-case basis in discussion with them, their family and professionals around them.
- Members of the education setting may need support in developing an understanding of trans and non-binary identities and experiences. Children, young people and their families should, when appropriate, be signposted to any additional support they may need.
- As with any decision taken about children in schools, teachers and other staff will need be aware of the impacts of their decisions on the individual child affected, but also on the wider school community. No two cases will necessarily be alike, and schools should, as they do with other decisions, deal sensitively with each case on its individual facts.
- Decisions about medical interventions are clinical and made outside of schools.

1.3 Overview

1.3.1 Throughout the toolkit we will be referring to schools, however the guidance is equally applicable in other education settings. Education settings are diverse communities that reflect wider society and are places where children and young people learn about valuing and respecting themselves and others. Children and young people spend a great deal of time in these settings and schools have a responsibility to ensure that all children and young people in their care feel safe to be themselves and supported to reach their potential. Trans children and young people may be a small group within a school community, but a potentially vulnerable one.

1.3.2 In this Toolkit the term ‘trans’ is used as an umbrella term to refer to children and young people who do not identify with the sex they were registered as at birth. Some, but not all, trans people undergo a process of social, legal and/or medical transition in order to live a life that better aligns with their sense of self.¹

1.3.3 A child can have the “protected characteristic” of gender reassignment, Section 7 of the Equality Act 2010. Section 7(1) of the Equality Act 2010 states:

¹ As the High Court noted in *R(AA) v NHS England* [2023] EWHC 43 (Admin); [2023] PTSR 60 at [5],

“A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex.”

Some children and young people may come within the statutory definition of gender reassignment. Determining whether any particular child has the protected characteristic of gender reassignment will involve a case specific factual assessment.² There is more detail in Appendix 1 on how the question of whether a child comes within the statutory definition of gender reassignment can be approached.

1.3.4 Where children are recognised as having the protected characteristic of gender reassignment, they must not be the subject of treatment which is discriminatory arising from their status as a trans child or young person.

1.3.5 Children and young people might describe their gender identity using other terms, such as gender queer, gender fluid and non-binary.

1.3.6 There will also be children and young people who are exploring their gender identity who will not come within the definition of *“gender reassignment”* in section 7 of the Equality Act 2010. That does not mean that they do not require support and aspects of the suggested best practice in this guidance may be applicable to their circumstances. There may also be instances in which children with other relevant protected characteristics could be affected by decisions regarding trans children and young people. They are considered further below.

1.3.7 When children and young people’s understanding of their own gender differs from the expectations of those around them, they and their families can experience high levels of anxiety. Schools and colleges need to develop policies and practices which provide mechanisms for the school to sensitively respond to the particular needs of young people and their families in relation to socially transitioning, including where there may be a degree of conflict.

1.3.8 Every trans child and young person’s view, experience, needs and journey will be different, and they should generally be consulted and involved in the support they are offered. Decisions around support should be made in partnership with the child or young person’s parents or carers other than where it has been agreed at a senior level that there are sound reasons for not doing so.

1.3.9 The Toolkit does not address the needs of children and young people with differences in sex development, although it is possible some of the inclusive practice outlined would be appropriate support for such children and young people.

² As the High Court noted at [133] of *R(AA) v NHS England* [2023] EWHC 43 (Admin)

2 A Whole Setting Approach

2.1 Introduction

2.1.1 Many Brighton & Hove schools are already working to ensure that the school environment and curriculum celebrates similarity, difference and diversity such that all children and young people see themselves and their families represented and valued.

2.1.2 If a whole setting approach is taken that will help ensure harm to trans children, young people, students and staff in the school community is prevented or minimised and all children and young people will be prepared for life in the modern world.

2.1.3 For specific guidance on creating safe learning environments for other groups protected under the Equality Act 2010 contact Brighton & Hove's Equality & Anti-Bullying Service.

2.2 Role of governors

2.2.1 A 'whole school' approach includes governors. For example, it might be beneficial for at least one member of the governing body to have attended trans awareness training and has read this Toolkit. It is also important that governors have had training regarding their responsibilities under the Equality Act 2010. This should include developing an understanding of the challenges faced by trans children, young people and their families as well as other aspects of the Equality Act.

2.2.2 The governing body might want to consider the following points:

- Does the school collate and analyse data on bullying and discriminatory treatment?
- What is the school doing to prevent and challenge gender stereotypes?
- What changes have been made to policies and practice to support the wellbeing of gender exploring, trans and non-binary children and young people? Has the school considered its duties under the public sector equality duty when making such changes?
- What steps has the school taken to keep parents and carers updated on our equality practice?

2.2.3 Governors should manage any concerns or complaints in accordance with the school's policies and procedures. It is important that complaints concerning trans inclusion are managed by governors with a good understanding of the issues referred to in this toolkit, who are respectful to all parties and hold in mind the wellbeing of the child(ren), or young person, and family concerned. Further case specific advice from professionals should always be sought where needed.

2.3 Staff and governor training

2.3.1 Brighton & Hove City Council consider it to be best practice for all staff and governors to be provided with training that develops trans awareness and confidence in terminology and vocabulary e.g. use of pronouns and names, and in challenging gender stereotypes, sexism and transphobia. Staff working with individual trans and gender exploring children and young people might need additional, specialist training to provide pastoral support.

2.3.2 It is recommended that training is provided to staff delivering PSHE classes to ensure they have a better understanding of the issues, the confidence to apply the guidance in the toolkit, and to provide appropriate support to trans children and young people. This should lead to better experiences for children and young people when they need support. Options for staff and governor training can be provided by Brighton & Hove City Council, email TransToolkit@brighton-hove.gov.uk

2.4 Parent and carer community

2.4.1 All parents and carers should feel that their child and family is represented within the setting.

2.4.2 Schools may find they are approached by parents and carers about trans inclusive practices. Schools should listen openly and respectfully to any questions or concerns, provide information and be in a position to offer the following kinds of reassurance:

- The setting acknowledges there are a diversity of views about trans inclusion and will listen respectfully to views.
- The setting is preparing children and young people for life in modern Britain where they are going to meet and work alongside a range of people.
- The setting is working to develop its equality practice across all protected groups and efforts are being made to ensure all groups feel safe, represented and included.

2.4.3 Any complaints made should follow a school complaints policy. Schools can contact the council about concerns raised by members of the school community.

2.5 Bullying on the basis of gender reassignment or sex

2.5.1 Schools need to be able to recognise the difference between freedom of expression of a genuinely held belief sensitively expressed, and behaviour and language which amounts to harmful prejudice or bullying. A failure to take appropriate steps to protect a child from bullying, because of the protected characteristic of gender reassignment, may amount to unlawful discrimination. Bullying should never be tolerated in schools and colleges.

For definitions of bullying, prejudice and scripts for challenging prejudice please see Appendix 4. Schools should be mindful about how so-called 'banter' or 'jokes' used in peer groups can tip over into causing harm.

2.5.2 Schools should ensure that they identify, record, respond to and monitor all forms of bullying and prejudice. *Brighton & Hove's Recording and Reporting Guidance* (available on www.beem.org.uk) advises that all bullying and discriminatory treatment are recorded and that these are recorded separately and by type. Recording of incidents means that the wellbeing of individual children and young people can be tracked as can the behaviours of perpetrators. This data along with data from school surveys can also be used to target preventative interventions and measure the impact of activities. Ofsted, when conducting an inspection, will ask to see records and analysis of bullying, discriminatory and prejudiced behaviour, including homophobic, biphobic and/or transphobic bullying, and the use of derogatory language.

2.5.3 Trans children and young people, as well as children who do not conform to gender norms or stereotypes, may be vulnerable to bullying. Additionally, children and young people with trans family members may also be vulnerable to bullying. Transphobic bullying therefore may be perpetrated by children, young people, parents, carers or staff members and directed at:

- Children, young people and adults who do not conform to gender stereotypes or are perceived to be trans.

- Trans children, young people and adults inside and outside the school community
- Children and young people with trans siblings, parents and carers, relatives or friends
- Lesbian, gay and bisexual children, young people and adults.

2.5.4 As a key preventative measure for transphobic bullying, schools should consider using the curriculum, assemblies and displays to prevent and challenge gender stereotypes and sexism. Gender stereotyping is harmful as sexism leads us to believe that boys and girls should present themselves in certain ways. This can lead to bullying and harassment.

2.5.5 Keeping Children Safe in Education has a strong emphasis on preventing and responding to peer-on-peer abuse and recognises the gendered nature of some forms of abuse in schools. Schools may also find Brighton & Hove's *Guide to Challenging Sexist and Sexual Language* (available on www.beem.org.uk) helpful in developing this area of safeguarding practice.

2.5.6 Identifying the nature of any bullying may assist the school to understand and then address any trends in the school community. Sexist, sexual or transphobic bullying are not the same as homophobic or biphobic bullying. However, sexist attitudes often manifest themselves in homophobic or transphobic bullying. A child or young person who is perceived as not expressing stereotypically masculine or feminine traits might experience homophobic or transphobic bullying.

2.5.7 Staff will need to use their professional judgement as to whether some incidents should be recorded as homophobic or transphobic but take care not to under-record transphobia.

2.5.8 Transphobic bullying may also occur in conjunction with other forms of bullying, including that related to special educational needs and disabilities or cyberbullying. Trans children and young people can be particularly targeted with behaviours such as 'skirt lifting', 'groping' or being asked inappropriate, personal questions. Again, schools should be vigilant in preventing and responding to all forms of sexual harassment and bullying.

2.5.9 If an apparently transphobic incident occurs in a group situation and the member of staff dealing with it is aware that the child or young person is trans, but they are not 'out' to the rest of the community, the member of staff will need to use their professional judgement as to whether the incident is targeted to a young person's transgender status. It might be appropriate to challenge the prejudice, but care may be needed to avoid labelling the incident as transphobic in front of other children and young people, as this could result in 'outing' the person being targeted. This approach would not prevent the incident being recorded as a transphobic incident.

2.5.10 There may be occasions where transphobic bullying has wider safeguarding implications, or involve criminal behaviour, and in these cases, schools need to engage the appropriate safeguarding agencies and/or the police. Further resources to support anti-bullying practice can be found on www.beem.org.uk.

2.6 Language

2.6.1 It is considered best practice for staff to be thoughtful about the use of gendered terms for all children and young people, avoiding using language which reinforces certain stereotypical ideas of femaleness or maleness. For example, asking for two strong boys to move a piece of classroom furniture might imply that girls cannot be physically strong.

2.6.2 Care needs to be taken to avoid unnecessary references to gender which may exclude those who do not identify as male or female (e.g. non-binary) or makes assumptions about someone's gender identity based on their gender

expression. Schools can develop a repertoire of gender-neutral language that reflects their community such as “learners”, “Year 8”, “folks”, “partner”, etc. and use when appropriate.

2.6.3 The purpose of this thoughtful use of language is not to deny sex and gender as important parts of our identity, in fact we generally need to use binary language to talk about sexism, sexual harassment and sex specific life experiences. Equally, where someone’s gender is known then it will often be more appropriate to use gendered terms such as mum or grandma.

2.7 Curriculum

Celebrating difference and challenging gender stereotypes in Early Years and beyond

2.7.1 The statutory Early Years Foundation Stage Framework enshrines the importance of children developing a positive sense of themselves as part of personal, social and emotional development. It is recommended as best practice for schools to promote and develop with all children an understanding of ‘self’ and who they are in relation to other people. They should support pupil voice, choice and advocacy around celebrating their unique identity.

2.7.2 It is important to consider how gender stereotyping shapes the learning and play environment. Children who do not conform to gender stereotypes can feel that ‘being different’ is a bad thing, and in these environments may feel that they are doing something wrong by not conforming to gender stereotypes.

2.7.3 It is considered best practice to develop an inclusive environment for play and learning in early years and, in age-appropriate ways, continue this in primary and secondary education. Examples could include using resources, visitors, images and books that avoid gender stereotypes and represent a range of gender expression across the curriculum.

2.7.4 See the PSHE resources pages on www.BEEM.org.uk for potential resources.

A curriculum that represents diversity

2.7.5 An awareness and understanding of people who identify as trans or are exploring their gender identity should be taught in age-appropriate ways within a whole school curriculum where all protected characteristics are respected.

2.7.6 This might be achieved by using diversity as a thread running through the whole curriculum:

- Include discussions of diversity in school assemblies, lesson plans, pupil-led campaigns, and in the wider community.
- Use equality calendar events such as LGBT History Month (February) and International Trans Day of Visibility (31 March) as opportunities for further work.
- Ensure that resources and displays challenge gender stereotypes and actively celebrate different families and LGBT people, along with all protected groups.

Teaching and learning approaches and supporting learning needs.

2.7.7 Some teaching and learning approaches may make trans children and young people feel confused, excluded or uncomfortable. Putting children and young people into single sex groups can be one of these times. There may be times when single sex groups are needed. This may include aspects of relationship and sex education or to support the

learning needs of particular groups (e.g. boys and literacy). Providing a clear need is identified, the Equality Act 2010 allows for such provision³. However, it is recommended that school staff only group by sex when it is educationally necessary, and the rationale can clearly be explained.

2.7.8 Where teaching is undertaken in single sex groups, the school will need to consider where it is appropriate for a trans child or young person to be placed, including having regard to the wishes and feelings of the young people concerned and any risk of “outing” the young person to their peers.

2.7.9 Statutory Guidance, Relationships Sex and Health Education recommends that all children and young people have access to the same information about puberty:

Puberty including menstruation should be covered in Health Education and should, as far as possible, be addressed before onset. This should ensure male and female pupils are prepared for changes they and their peers will experience⁴.

Personal, Social, Health and Economic Education including statutory relationships, sex and health education.

2.7.10 Brighton & Hove schools are signposted to the PSHE Association Programme of Study which takes a considered and inclusive approach to LGBT identities. Brighton & Hove’s PSHE Service provides additional guidance and resources to support schools in effective delivery of this curriculum.

2.7.11 Schools should ensure that they comply with the Statutory Guidance, Relationships, Sex and Health Education. The current guidance makes clear that:

Schools should ensure that all of their teaching is sensitive in approach and content. They should ensure that LGBT content is fully integrated into their programmes of study for this area of the curriculum rather than delivered as a standalone unit or lesson. Schools are free to determine how they do this, and we expect all children and young people to have been taught LGBT content in line with the statutory guidance and the needs of pupils so that they have an understanding of the world around them.⁵

2.7.12 Relationships and sex education lessons must not reinforce harmful stereotypes, including those which might imply gender stereotyping or that a person may be trans based on their gender expression or behaviours. The non-statutory DfE Guidance ‘Plan your relationships, sex and health curriculum’ states that:

“Materials which suggest that non-conformity to gender stereotypes should be seen as synonymous with having a different gender identity should not be used”.⁶

³ Equality Act 2010: Advice for Schools <https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools> (Section 3.19, retrieved 18.7.24)

⁴ Statutory Guidance, Relationships, Sex and Health Education <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education> (p31. Retrieved 27.06.2024 – para 88.

⁵ DfE, Statutory Guidance, Relationships, Sex and Health Education <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education> (Retrieved 18.7.24)

⁶ DfE Guidance Plan your relationships, sex and health curriculum <https://www.gov.uk/guidance/plan-your-relationships-sex-and-health-curriculum#ensuring-content-is-appropriate> (Retrieved 18.7.24)

2.7.13 Children and young people should have access to a diverse range of resources including those that show stereotypical and non-stereotypical gender expressions; ‘masculine’ girls and ‘feminine’ boys; different families; trans and non-binary people; and men and women in a wide range of careers. Brighton & Hove materials and resources on gender stereotyping make it clear there is more than one way to be a boy or a girl.

2.7.14 Additional ideas to consider for making relationships, sex and health education trans inclusive might include:

- Use gender-neutral names when designing some case studies, scenarios or characters for use in PSHE lessons.
- Represent trans people in scenarios and resources used.
- Start any teaching around puberty and bodies by highlighting that all people’s bodies and genitals are different and that there will be a diverse range of responses to puberty.
- When labelling the genitals consider the message that these relate to biological sex rather than gender.
- Present sexual health information with an awareness that for trans young people their body may not sit comfortably with their gender identity.

2.7.15 If you know you have a trans child in the class, some planning, pre teaching or one-to-one support may be necessary to ensure the child gets the information they need in a way that feels supportive to their sense of self in relation to their gender identity.

2.7.16 Some screening procedures, for example cervical screening, are sex specific and are important for everyone to know about. The Terrence Higgins Trust and Gendered Intelligence have resources for older students, which inform about trans health.

2.7.17 It is good practice to explore different viewpoints as part of relationships, sex and health education, and children and young people may bring a range of genuinely held religious and other beliefs about trans identities to discussion. In these circumstances, teachers will need to be mindful of the diversity of views within faith groups and manage the discussion so that all children are treated with respect. Teachers should seek to ensure that the lesson does not become a debate about the rights of any group protected in law. Training may be needed to manage these discussions.

2.7.18 Under the Public Sector Equality Duty, there is a duty on the responsible body of a school to show due regard to the need to foster good relationships between different protected characteristics, and between certain protected characteristics and those without them.

2.7.19 Schools are at liberty to teach the tenets of any faith on the protected characteristics. For example, they may explain that same-sex relationships and gender reassignment are not permitted by a particular religion. However, if that approach is taken it will generally be appropriate to also set out the legal rights LGBT people have under UK law, and that these rights must be respected.⁷

2.7.20 It is important for schools to engage with parents and carers around relationships and sex education. Some parents and carers may have concerns about the education provided contradicting their faith or beliefs, and schools should work with these families to hear and respond to these concerns as outlined in section 5.4 and guidance provided by the PSHE Service. Schools are reminded that:

⁷ Inspecting Teaching of the Protected Characteristics, Ofsted, 2020

<https://www.gov.uk/government/publications/inspecting-teaching-of-the-protected-characteristics-in-schools/inspecting-teaching-of-the-protected-characteristics-in-schools>

“the religious background of all pupils must be taken into account when planning teaching [of Relationships, Sex and Health Education]”⁸

2.7.21 For further resources to support teaching and learning about relationships and sex education including puberty, gender stereotyping, family diversity, LGBT identities and anti-bullying please go to www.BEEM.org.uk and contact the Brighton & Hove PSHE Service.

2.8 Single-sex schools

2.8.1 This guidance is equally applicable to single-sex schools, however there may need to be greater emphasis on ensuring the safety and inclusion of trans children and young people in single sex schools. If a child transitions to a different gender from that of the school they are in (e.g., a trans girl at a boys’ school) discussions should take place with the young person and their family on how to accommodate the transition within school policies and processes. It will not be lawful to exclude the child from the school because they have transitioned to a different gender.

2.8.2 Issues can also arise regarding admission of trans children to single-sex schools (for example, if a trans child seeks a place at a single-sex school consistent with their gender identity but not their registered sex). These issues are complex and schools should take advice on them if they have concerns.

⁸ Statutory Guidance, Relationships, Sex and Health Education
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education> (Retrieved 18.7.24)

3 Supporting an individual trans child or young person

3.1 An individualised approach to support

3.1.1 There is not a one size fits approach in supporting a trans child or young person or a child or young person exploring their gender identity. As would be done for any other vulnerable child or young person, allocating a key member of staff, can be an important first step.

3.1.2 It is vital that each child and young person is met with the kindness, compassion and support needed to keep them and their peers safe and well. There may be additional challenges for trans children and young people and students from certain faith or cultural backgrounds, or those who have special educational needs or a disability. It is important for schools to see all aspects of a child's identity and experience in thinking about how to best support them.

Non-binary children and young people

3.1.3 Certain sections of this guidance refer to binary trans children and young people, however the principles of this toolkit and the sections related to pronoun change, dress, curriculum and gender stereotyping may also be relevant to the inclusion of non-binary children and young people.

Gender exploration

3.1.4 In her independent review of [gender identity services for children and young people commissioned by NHS England](#) Dr Hilary Cass states, "It is not unusual for young people to explore both their sexuality and gender as they go through adolescence and early adulthood before developing a more settled identity."⁹

3.1.5 It is important to acknowledge that some children and young people will go through a period of exploring their gender identity. Over time some of this group may realise they are comfortable with their registered sex, for others this may be part of a longer journey. This exploration can come in many forms and appear at different ages. It may include exploring gender expression, for example changes in what they wear or how they present, and for others it may relate to their sexual orientation. It may also include wanting to be known by a different name and or pronoun. It is important to recognise that exploring gender or coming out as trans is a hugely significant step and the initial response can have a lasting impact on the individual. The choice to share information about gender exploration or to come out is a personal one and will be done when the time feels right for the child or young person. They may talk to some people and not others, may share it very openly in school or a wider community, or only want one person to be aware.

3.1.6 If a child or young person makes the decision to come out or talk about their gender exploration to you at school, it is a big step, and they likely consider you a trusted adult in their life. Acknowledge what they say, be empathic and thank them for speaking with you. If you aren't sure about terms the young person is using, it is generally appropriate to ask. A first step may be to gently ask some questions 'Can you tell me more about how you feel...?' 'How long have you been thinking this...?' 'Have you spoken with anyone else / family members...?' A watch and wait policy can be adopted and pressure should not be placed on any child or young person to live or behave either in accordance with their sex registered at birth or to move to gender transition.

⁹ <https://cass.independent-review.uk/home/publications/final-report/>

3.1.7 In some schools, the child or young person may have discussed their gender exploration or transitioned in a previous school setting. School staff should be mindful that this child or young person may only talk to or come out to a small number of school staff or their peers and as such their information must be kept private and confidential (unless the circumstances require otherwise). It is also the case that schools may not be aware of all the gender exploring and trans children and young people in their community.

3.1.8 Whilst a child or young person and their family may be keen to come out and make transitions as quickly as possible, school staff may need to work with them, to ensure they are supported and manage this process thoughtfully. This will help to ensure the safety of the child or young person who is coming out and to support their peers in understanding any changes.

3.2 Working with the parents, carers and siblings of trans pupils and students.

3.2.1 Schools should ideally work in close partnership with parents and carers. Parents and carers will often be the ones to approach the setting about the needs of their trans child. Many parents and carers of a child or young person who is gender exploring or who comes out as trans will be supportive of their child; although they may also experience some shock, concern and grief for the child they feel they may lose, and the future they imagined for them. They may also fear community reactions. Very occasionally, parents and carers will seek to prevent their child from making any steps they regard as amounting to moving towards social transitioning and extra time, support and care will need to be offered to both the child and the family.

3.2.2 Difficulties may arise for schools where a child who wants to make a social transition at school does not wish their parents or carers to be consulted or notified. Schools should seek to explore with the child why they do not wish their parents or carers to be involved or told they are considering transitioning. There may also be cases in which the school is concerned that informing a parent could have a detrimental impact on the wellbeing of a child or young person. Governing bodies of maintained schools have obligations to ensure “their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school.”¹⁰ In cases in which schools have concerns about safeguarding and that informing parents or carers about a child’s gender identity could impact on the welfare of a child, or if there are cases in which parents or carers do not want their child to take steps towards socially transitioning despite the child’s wish to do so, schools should seek further advice. They should also ensure any decisions are clearly documented by the school and decisions signed off at a senior level.

3.2.3 Siblings of a trans child or young person may also need support, especially if they attend the same school. They may find the situation difficult and may find it hard to accept their sibling’s gender identity. Even if they are supportive of their sibling, they may also encounter transphobia and transphobic bullying as a result of having a trans family member or feel conflicted if there are different responses to the trans child within the family. They may feel that parents and carers are giving more attention to a trans or gender exploring child. Siblings should be given opportunities to discuss their own feelings with pastoral members of staff if they wish. Support may be needed over an extended period.

¹⁰ Education Act 2002 s 175(2).

3.3 Transition

Medical transition

3.3.1 Transition can be divided into ‘social’ and ‘medical’ transition. It is not the role of schools to make decisions about medical treatment.

3.3.2 If a young person proceeds with medical transition of any kind, this is likely to have an added impact their schooling.

3.3.3 Coming to terms with being trans and gender exploring can be a difficult time at any age. Starting the initial stages of medical transition can be particularly demanding for a young person and their family. This can be exacerbated by long waiting times to access medical support, and the lengthy assessment process involved. It is therefore a time when pastoral support is likely to be needed.

3.3.4 Children and young people needing time off for a medical appointment should be recorded with an M code.

Social transition

3.3.5 The Independent Review of Gender Identity Services for Children and Young People, also known as the Cass Review, identifies that there is no single definition of social transition, but it can broadly be understood to refer to:

- A gendered name change.
- A change in pronoun (he, she, they, zie etc.).
- Wearing clothes that are associated with their gender identity.

3.3.6 Schools should be mindful that there will be many occasions when children and young people experiment with their identity when they are not socially transitioning, for example, many children will adopt a nickname.

3.3.7 Not all children and young people who wear clothes associated with a gender different to that of their sex registered at birth are trans. Equally, a trans person may choose not to wear clothes stereotyped as being for their gender identity. The approach set out in this Toolkit encourages schools to provide for a wide spectrum of gender expressions and have openness to the diversity shown by children and young people. Work on sexism, gender expression, gender stereotyping and particularly masculinity and femininity should be done across the school to ensure all children and young people feel respected in their gender expression.

3.3.8 Where it becomes apparent that a young person has made a choice to socially transition as stated above, schools should not ordinarily support a child or young person to socially transition without first involving the child or young person’s parents or carers and establishing an agreed way forward. The starting point will be to explore with the student sharing what they are seeking with the family. As set out above, in cases in which a child or young person wishes to take steps towards socially transitioning and their parents or carers are opposed, or the school has cogent safeguarding concerns about involving the parents or carers, further advice should be sought. This may include the need for fact specific advice on whether the child is “Gillick competent”, meaning that they are sufficiently mature to make decisions without the express consent of their parents.

3.3.9 In cases where parents and carers do not consent to their child making any steps towards a transition, additional support will need to be offered to this student and their family, with additional professional advice taken as necessary. If there are concerns that the refusal of parents' or carers' agreement is impacting on the child's mental health and wellbeing the school should seek professional advice to support the decision-making process and communication with the family.

3.3.10 It is important to be mindful that for changes such as names and pronouns to be acknowledged in the wider community, a level of information sharing will need to happen amongst staff, children and young people. This should, as much as possible, be led by the child or young person asking for these changes and may include an educational element to ensure other children and young people have the appropriate knowledge and understanding of the issues.

3.3.11 It is also important to note that particular care should be taken regarding social transition for pre-pubescent children. Options should be kept open for these children and consideration given to whether this decision is being driven by the young person or the parent or carer.

3.3.12 A child or young person's goals in terms of transition may change over time and the support offered may need to be adjusted accordingly. For example, a child or young person may start on a transition pathway, realise this isn't the right path for them and reverse some or all aspects of their social transition.

3.3.13 Some children and young people, including those with SEND, may not feel the same pressures or awareness of 'fitting in' socially, or may have empathy differences that make it difficult for them to understand their families or friends' perspectives or feelings. Once they have 'come out' to one person they may have unrealistic ideas or timeframes about how their journey will progress, and this can leave little time to build a supportive plan. Schools will need to develop plans that meet the needs of an individual but provide effective support for them and the wider community.

3.3.14 Some trans children and young people will need support in developing scripts and responses to questions they may be asked about their transition. This may include phrases such as 'It's none of your business...' 'I have always been a boy / girl'. 'Non-binary means...' This support can be done with a trusted adult at school, family and working in collaboration with another appropriate professional.

3.4 Timing of transition (including primary to secondary transfer)

3.4.1 Schools will have children and young people at different stages of transition; including those who have transitioned prior to attending their school. The level of and type of support needed may vary according to the individual and their stage of transition.

3.4.2 Some trans children may begin to socially transition at primary school. Before they move on to secondary school, the following steps are recommended:

- Have a meeting with the child (and their parents or carers) to find out if they have any worries and discuss how they would like any issues that arise to be managed.
- Allocate a named contact or 'trusted adult' for the child to approach if issues arise during the school day. This will limit the number of adults they will have to come out to or explain their story to if there are any challenges.

3.4.3 The Independent Review of Gender Identity Services for Children and Young People highlights some of the

concerns regarding primary aged children starting social transition. The report recommends maintaining flexibility and keeping options open by helping the child to understand their body and their feelings¹¹. This could be achieved through a high quality PSHE curriculum.

3.4.4 Some children and young people, with support from their families, may make a transition into their preferred gender identity at a point when they are changing schools. Secondary schools will therefore need to be particularly aware and supportive of children transferring from a primary to secondary school who are planning to begin Year 7 with a different name and pronoun. This could include working with students from the original primary school who are aware of this change.

3.5 Students with additional considerations

3.5.1 Some trans children and young people may also have Special Educational Needs and Disabilities (SEND), come from a faith background, be Black or Racially Minoritised (BRM) and/or have been in care. As such, it is important for schools to adopt a case-by-case approach for an individual child that takes into account all relevant additional considerations.

Special Educational Needs and Disabilities (SEND)

3.5.2 Children and young people with SEND may need additional support in understanding or accepting their own identity, learning about those who are different to them, and understanding that difference is to be respected and celebrated.

3.5.3 Staff, parents, carers, and wider professionals may need support in understanding that a child or young person with SEND is just as likely to be lesbian, gay, bisexual, trans or gender exploring as any other person. The National Autistic Society includes articles on its [website](#) about this.

3.5.4 It is important that a child or young person's words or actions are not automatically attributed to their SEND, for example, preferences for clothing types or hair length being seen as a sensory need, or behaviours described as a new special interest, fascination, curiosity or phase. Whilst this may be true in some instances, it is important to listen without judgement so that expressions of exploring gender identity are not dismissed.

3.5.5 Emotions related to gender identity are complex for anyone to understand and express, and this could be exacerbated in those with communication and interaction difficulties.

3.5.6 Some children and young people with SEND may not understand that others do not already see them in the same way as they see themselves or know themselves to be and so not see the need to communicate. This may lead to increased frustration and anxiety and impact negatively on well-being and mental health. Providing one-to-one support for the child or young person to explore issues in a non-judgmental, safe way with conversations that go at the child's pace will be important.

3.5.7 Differences in social understanding, empathy and communication may mean specific support is needed. Tools

¹¹ <https://cass.independent-review.uk/home/publications/final-report/>

such as Mind Mapping, Comic Strip Conversations and Social Stories may be useful to support communication and understanding.

3.5.8 In addition, there may be potential increased vulnerabilities of a young person with SEND. Staff will need to give increased support as needed and teach children about safety including online.

3.5.9 Specific support is available from the Brighton & Hove Inclusion Support Service (BHISS).

Black, and Racially Minoritised (BRM) children and young people and children and young people from faith backgrounds

3.5.10 BRM trans people are likely to face discrimination based on their race and gender, and this can make seeking support harder. By coming out as trans some children and young people of faith may risk losing their communities.

3.5.11 All major faiths have LGBT inclusive groups, and these may be a helpful resource for professionals and some children, young people and their families.

3.5.12 Allsorts Youth Project has support and resources written by and for young LGBT BRM people and young people of faith.

3.5.13 In conversation with children, young people and their families, schools may also encourage, if appropriate, the seeking of support from faith, cultural and community leaders or groups.

Children who are in care/care experienced children

3.5.14 Children and young people who are living in a care setting or have experienced care are likely to come with additional vulnerabilities due to their experience. This could include previous traumas, attachment difficulties and challenges with managing emotions. For children living in care, it will be vital that the communication between professionals, school, carers and child is clear and transparent.

3.5.15 Children in care who are wishing to change their name may have additional challenges due to the differing levels of legal responsibility the adults around them have to input into legal decision making. The position should be clarified with the child's social worker.

3.5.16 Children and young people in care may often have experiences of neglect and feeling unheard. Further frustrations around a delayed name change are likely to amplify these feelings.

3.5.17 The child or young person in care may have to come out multiple times to various professionals involved in their care. Equally, they may only come out to one person but find multiple people are aware. The child or young person should be informed of what information is being shared and to whom.

3.6 Signposting to additional support

3.6.1 Signposting children and families to local sources of specialist support can be helpful. In Brighton and Hove there is specialist locally based support for children, young people and their families and schools.

3.6.2 Further information can be found at www.allsortsyouth.org.uk

3.6.3 Trans children and young people with other vulnerabilities including mental health needs can be referred on to appropriate services through the usual school pathways.

3.6.4 Medical advice should be provided via the NHS.

4 Managing specific issues for trans children and young people

4.1 Access and safety for all

4.1.1 There are likely to be children and young people at various stages of exploring their identities or transitioning within schools. The information which follows will be relevant to some children and young people and not others. Schools may wish to consider the guidance below and apply on an individual, case by case basis and seek further advice if needed. This guidance should be considered alongside the rights of other children and young people in the school (especially girls and members of particular religions or those holding particular beliefs).

4.1.2 As part of ongoing work to ensure safe learning environments, schools should carry out a range of activities that ensure respectful behaviour by all children and young people in all areas of the school building, including toilets and changing rooms. This might include, as part of a setting's ongoing anti-bullying work the encouragement to all children and young people to report any areas of the building where they feel unsafe. Any child or young person acting inappropriately in toilets or changing rooms should be challenged or sanctioned in line with the school's behaviour policy.

4.1.3 The Toolkit encourages a mixed model of provision rather than the removal of single-sex spaces. Staff are best placed to evaluate how to balance any competing sensitivities, whilst actively supporting the welfare of trans students. Brighton & Hove City Council has seen no evidence either in research or in the city's schools that a trans child or young person (as defined under the gender reassignment definition in the Equality Act 2010) using facilities aimed at a gender that is not the one registered at birth presents a threat to other children or young persons using the facilities.

4.1.4 It is recommended that schools carry out equality impact assessments when making changes to existing provision so that they identify, and can mitigate, any potential negative impacts of changes, having regard to the rights of all children and staff. For more advice on individual cases, showing due regard and undertaking Equality Impact Assessments please contact the Equality and Anti-Bullying Service TransToolkit@brighton-hove.gov.uk

4.2 Toilets

4.2.1 Reg 4(2) of the School Premises (England) Regulations 2012 provides that 'Separate toilet facilities for boys and girls aged 8 years or over must be provided except where the toilet facility is provided in a room that can be secured from the inside and that is intended for use by one pupil at a time'¹².

4.2.2 Regulation 4(2) means that at least some single-sex toilets, or toilets "in a room that can be secured from the inside", must be provided in a school. Provided that is done, schools should go on to consider more generally how access to toilets within the school should be arranged and how that affects trans and other children. A policy, for example, requiring trans girls (with the protected characteristic of gender reassignment) to use the boys' toilets might constitute indirect discrimination on the basis of gender reassignment. It could constitute a 'particular disadvantage' for the trans girls. For example, there are health risks for children unable to access toilets during the school day (such as urinary tract infections) and the feeling of exclusion can be harmful to their mental health. As such, a policy of requiring a trans child or young person to use toilet facilities that do not align with their gender, might amount to *prima facie* indirect discrimination that would need to be justified. For *prima facie* indirect discrimination to be justified, the

¹² <https://www.legislation.gov.uk/uksi/2012/1943/regulation/4/made> (Retrieved)

relevant policy or practice must be a proportionate means of achieving a legitimate aim. This would need to be assessed on a case-by-case basis in discussion with the individual child or young person and considering the potential impacts on other children and young people.

4.2.3 Anecdotal feedback from trans children and young people is that many will opt for a gender-neutral toilet for fear of bullying or harassment rather than a large multi occupancy single sex facility. Single sex toilets can also cause issues for children and young people who do not identify with the gender binary of boy or girl.

4.2.4 Ideally, where funding and space allows, as well as toilets meeting the requirements of the 2012 regulations, schools should provide children and young people with access to a mixture of toilets including:

- unisex toilets which have blocks of floor to ceiling cubicle toilets that can be used by all, with bins for menstrual products in each cubicle ('toilets for everyone').
- accessible toilets.

4.3 Changing rooms

4.3.1 Regulation 4(4) of the School Premises (England) Regulations 2012 provides that "Suitable changing accommodation and showers must be provided for pupils aged 11 years or over at the start of the school year who receive physical education".¹³

4.3.2 The Technical Guidance for Schools in England of the Equality and Human Rights Commission provides the following example:

A school fails to provide appropriate changing facilities for a transsexual pupil and insists that the pupil uses the boys' changing room even though she is now living as a girl. This could be indirect gender reassignment discrimination unless it can be objectively justified. A suitable alternative might be to allow the pupil to use private changing facilities, such as the staff changing room or another suitable space¹⁴.

4.3.3 The use of changing rooms by trans children and young people should be assessed on a case-by-case basis in discussion with the individual child or young person. In making a decision as to which changing room a trans child will use, a school will need to consider the needs of all other children and young people including girls and those with relevant religious or other beliefs. It should consider whether any decision it takes regarding trans children impacts on children with other protected characteristics (which include sex and religion). If, for example, a decision regarding trans children could be shown disproportionately to disadvantage girls or members of particular religious groups, the school would need to show that disadvantage was justified (see above 4.2.2 on justification in indirect discrimination cases). Ultimately schools will need to balance the impacts of its decisions on all children potentially affected. In doing so it should avoid stereotypes or presumptions about how members of particular groups will react or be affected by decisions regarding trans children, and it should work to dispel stereotypes or misunderstandings that children or young persons may have about trans children.

4.3.4 Any child or young person who has a need or desire for increased privacy, regardless of the underlying reason, should generally be provided with a reasonable alternative changing area such as the use of a private area or with a separate time to change. Any alternative arrangement should be provided in a way that keeps the reason for the

¹³ <https://www.legislation.gov.uk/uksi/2012/1943/regulation/4/made> (Retrieved 28.7.20)

¹⁴ <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-schools-england> (Retrieved 07.11.24)

alternative provision, be that trans status or anything else, confidential.

4.4 PE and sports

4.4.1 As in relation to changing rooms, if schools separate PE or sports by sex they should consider how any decisions about participation affects both trans children and young people and other members of the school community. If, for example, a school insisted on trans children or young persons doing PE or playing sports only with those of their sex as registered at birth, that may well disadvantage those with the gender reassignment protected characteristic under Equality Act. They may find it humiliating and in some cases it may “out” them. A school would therefore need to show that any such policy or practice was justified as “a proportionate means to achieve a legitimate aim” if it was to be lawful (see paragraph 4.2.2 above). It may also be said that allowing children to do PE or play sports in accordance with their gender identity disadvantages others in the school (for example, depending on age, stage of development and the specific sport involved, it may be said that girls are disadvantaged by allowing trans-girls to participate in separate “female only” PE or sports lessons). If that were the case, the decision to allow the trans child or young person to participate in accordance with their gender identity would need to be justified. The concerns about seeking to balance the impacts of decisions on all children potentially affected and avoiding stereotypes or presumptions discussed above at paragraph 4.3.3 apply equally.

4.4.2 In considering how the right balance should be struck, schools should avoid stereotyping sports as being for one sex or the other. PE teachers, as part of their usual practice, should take account of the range of size, build and ability of individuals in the class and differentiate accordingly to keep all children and young people safe. Some activities may be segregated, for example, providing opportunities for girls to develop their football skills.

4.4.3 At primary level most PE lessons will be mixed sex. At secondary level lessons are more often segregated by sex. The issue of physical risk within certain sports should ordinarily be managed properly within the lesson context rather than by preventing young trans people from participating in lessons in accordance with their gender identity.

4.4.4 Schools are recommended to refer to the policies of the relevant governing body of the sport. For example, the Football Association has a policy in relation to transgender players.

4.4.5 Schools should consider how to make their own events inclusive and ensure there is opportunity for competition for all that want to participate in some format or other.

4.4.6 The handling of changing facilities at an ‘away game’ will also have to be sensitively managed. Staff should ensure there is appropriate provision available.

4.5 Residential trips

4.5.1 It is important that all children and young people are able to access wider opportunities such as residential trips and visits. Residential accommodation should be considered carefully on a case-by-case basis and further guidance and support should be sought where needed.

4.5.2 Schools should enter into discussion with the trans child or young person, and their parents or carers prior to residential trips. The school should identify, first, how the trans child or young person would like to be accommodated. Families will have usually thought about this carefully. The school will need to consider whether, and if so how, this request can be implemented, and if necessary and appropriate, carry out a risk assessment of the proposal, considering the dynamics with other children. The school must consider the importance of ensuring the participation of trans children and young people, as well as the rights of other children (including girls and those with a religion or belief).

Particular care and consideration may be required where a child or young person is not known to be trans to peers. Schools who know their student communities well will be in the best position to make decisions in individual cases.

4.5.3 Practical solutions could include access to gender neutral toilets (for example accessible toilets); staggering access to showers; sharing a bedroom with trusted friends with appropriate previously agreed arrangements; ensuring showers and toilets are lockable for privacy (e.g. en-suite facilities in shared rooms) and access to private individual changing areas.

4.5.4 Prior to the start of a residential trip, schools should make clear their expectations to all children and young people about how they support and treat each other. When planning overseas trips, schools may wish to consider and investigate the laws regarding trans communities in countries considered for school visits. The International Lesbian and Gay Association (ILGA) have information on their [website](#) about countries where trans individuals may be at risk. In addition, legal documentation such as the child or young person's passport may not have been changed to the name and/or gender they are using. This will need to be handled sensitively by the leaders of the trip.

4.5.5 Further guidance can be found here: <https://oeapng.info/downloads/good-practice/> (4.4L Transgender young people & visits).

4.6 Uniform and dress

4.6.1 Beginning to dress in the clothes associated with one's gender identity can be a big step and potentially daunting. It is important for care to be taken to ensure that trans children and young people are shown sensitivity and understanding during this time as it may be a very visual representation of the transition process.

4.6.2 Having the availability of a non-gendered school uniform list is one way that a school might choose to be supportive to all children and young people. By providing a choice of approved items of uniform and allowing children and young people to choose what they wear, schools could allow for regulated structure and remain inclusive.

4.6.3 Staff training is recommended to ensure that all staff understand what it means to be trans and that children and young people may express their gender in a range of ways that are not connected with being trans. PSHE programmes will be challenging gender stereotypical ideas that to be a woman or a man you have to look a certain way.

4.7 Name and pronoun changes

4.7.1 Some trans children and young people may wish to change the name they are known by and their pronoun (e.g. he, she, they).

4.7.2 Respecting a child or young person's request to change name and pronoun is an important part of supporting and validating their identity. Some people who consider their gender identity as not fitting into a binary (boy/girl or man/woman) and may use gender neutral pronouns (for example, 'they' or 'zie').

4.7.3 The use of pronouns and gender identifiers may be important to children and young people. It is recommended that schools develop clear evidence-based policies that are transparent, setting out what is expected of staff, children and young people. In order to best support trans children and young people, the approach should be to recognise the potential vulnerabilities of this group and where possible adopt the requested names and pronouns.

4.7.4 It will often be important to consistently use agreed pronouns and names to protect a child or young person's confidentiality and to not 'out' them in ways that may be unsafe and exposing. If a mistake is made with a name or pronoun then this can be apologised for.

4.7.5 Where staff become aware that an adult or child is deliberately calling someone by their name registered at birth, after they have changed their name, or misgendering them (using the wrong pronoun or referring to them as their previous name) then appropriate challenge and, if necessary, action may be made with reference to the setting's equality and anti-bullying policies.

4.7.6 Schools will need to work with the trans child or young person and their family, to agree how to communicate any changes to names and pronouns to the wider staff team.

4.8 School Data Recording

Last name

4.8.1 The child or young person's full legal surname should be recorded, as the school believes it to be. Schools are **not** expected to have verified this from a birth certificate or other legal document.

Forename and deed poll

4.8.2 A child over the age of 16 has the legal right to change their name by deed poll without the consent of those with parental responsibility (PR). For a child or young person under 16, consent from all those with parental responsibility is required to legally change the name.

4.8.3 If the child or young person does not legally change their name, schools can still support their wishes to be known by a different name if it is considered in their best interests to do so. The Department for Education guidance is that a formal name change is not required, for the school to refer to the young person by a new forename. The new name should be recorded as the child or young person's 'preferred name'. However, the register should still show the child or young person's original, legal name.

4.8.4 Although some young people may feel that they want to change their name by deed poll, others may not feel that this is a step that they are ready or able to take. This will mean that although they may have established themselves within the school under a chosen name, they will have to use their birth name when filling in exam documentation.

4.8.5 This could potentially be a source of distress for that individual and care should be taken by staff to support the young person so that it does not invalidate their identity. Staff should remain sensitive and supportive during such times.

4.8.6 There may be sensitivities for looked after children in relation to making name changes. Schools should consider the section in relation to looked after children above before making any decisions.

Legal name field and exams

4.8.7 To make changes to the child or young person's Legal Name field, evidence is required. The issuers of documents of 'value' (such as passports, driving licences, degree/exam certificates) have a duty to prevent fraud and typically ask for evidence of name change as part of that duty. This evidence is generally a deed poll, described above.

4.8.8 Legal names are required to be used when registering children and young people for accredited exams. Schools and colleges should ensure a strategy is agreed with the young person and their parents and carers, then agreed with the various exam boards, prior to starting accredited courses, as some exams may be sat in Year 10 and the length of time the process of re-registering may take has to be considered. Exam boards may be experienced in working with trans children and young people and be able to guide the school or college through the process. It is possible to change names on exam certificates but there may be a charge for this.

4.8.9 Once an exam result is accredited it will be linked with a Unique Pupil Number (UPN) or Unique Learner Number (ULN) which existed in the school census information submitted in January of the exam year. UPNs and ULNs are only linked with legal names (Legal Name refers to the name in which a child or young person arrives in education for the first time; the name on their birth certificate), not preferred names. Schools need to be aware that the DfE analysis of school performance will still present the young person in the sex registered by their UPN.

Recommendations:

- When sending data about the child or young person to third parties always ensure you are sending the correct information.
- Ensure that the selected chosen name is used on exam certificates before being sent to children and young people.
- Engage with the child or young person as well as their parents and guardians to agree a strategy for presenting the correct information to the examination boards.
- The examination officer should contact the relevant exam board to discuss their processes.

Gender and the school census

4.8.10 The DfE has implemented operational changes to how it collects a specific set of data linked to sex and gender, which have been in use and mandatory from September 2023.

[CBDS RFC 1233 - Sex and Gender Identity \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1154441/CBDS RFC 1233 - Sex and Gender Identity.pdf)

4.8.11 Four fields (Pupil Gender, Contact Gender, Pupil/Child Gender, and Gender) are being replaced with two new fields (Sex and Gender Identity). Sex is defined as sex registered at birth (male, female). Gender identity is defined as a person's inner concept of self, male, female, neither or a blend of both (boy/man, girl/woman, prefer to self-describe).

4.8.12 Reporting of sex to the DfE is mandatory. Recording gender identity will be optional at a local level. Brighton & Hove City Council request that schools continue to collect both fields from parents and carers and record both fields in their MIS. This allows schools to monitor specific groups within their schools and provide support as needed.

4.9 Confidentiality and information sharing

4.9.1 All people, including children and young people, have a right to privacy, although that right is not absolute. Information about a child or young person's transgender status, legal name, or sex registered at birth would also constitute special category data under GDPR (see [Special category data | ICO](#)).

4.10 Work experience

4.10.1 Where an educational setting is considering a work experience placement for a trans student, the setting must complete a suitable assessment on the potential placement to establish if there is any risk (physical or otherwise), taking account of rights of privacy - as a general principle personal information on the young trans person must not be shared.

4.10.2 Schools must be sensitive to this in their planning before any trans young person is placed in any business or organisation. Careful discussion about the placement with the students and parents and carers needs to happen as early as possible to ensure the placement is successful

4.11 Vaccinations

4.11.1 Historically, vaccinations have been given to young people of all genders together in a large space such as a sports hall. More recently, GP surgeries provide some schools with their vaccinations at the surgery while some vaccinations are given in the education setting.

4.11.2 Consideration should be given to trans children and young people if the vaccination is sex-specific i.e. a trans boy might find it very difficult to stand in a queue of girls awaiting a female-specific vaccination, or to be left behind when one gender is invited to leave class for a vaccination. Sussex Community Foundation Trust immunisation team will facilitate an individualised appointment for the young person in this case.

4.11.3 It should also be recognised that vaccinations are not always separated by sex (male/ female) and if it is still necessary to have mass vaccination sessions in school, then a queue for all genders could be used, as well as screens for the person receiving the vaccination be supplied to promote privacy whilst being included in the mainstream.

5 Trans staff and governors

5.1 This toolkit does not cover the needs of trans staff and governors. However, trans staff and governors can experience similar challenges to those outlined in the Toolkit including bullying and harassment. Schools are encouraged to think about ensuring they have good policies and practice in place to support these staff members. Unions may be useful for this purpose. Guidance for inclusive workplaces can be found on the NEU website:
<https://neu.org.uk/advice/equality/lgbt-equality/trans-educators-toolkit>

5.2 The following pages, documents or guidance can be searched for on www.BEEM.org.uk:

- The Safer Recruitment Toolkit (includes equality in employment issues in schools)
- Schools' absence management procedure and guidance (includes fact sheets on absence and disability and access to work; Quash for managers on mental health; Reasonable adjustments guidance for headteachers)
- Whistleblowing Policy (and other key employment policies)
- Wellbeing Framework (includes guidance on work life balance, dignity and respect at work and violence at work / incidence reporting):
- Access to general information on Equality Act impact on staff (including the Guaranteed Interview Scheme for disabled applicants).

6 Additional support

6.1 Signposting to nationally available resources, support and guidance can be found on the Equality & Anti-Bullying Service and PSHE Service pages of www.BEEM.org.uk

6.2 Equality and Anti-Bullying Service and PSHE Service

- Staff training – identifying, challenging and recording homophobic, biphobic and transphobic language and bullying.
- Policy review and development.
- PSHE curriculum development and teacher training.
- Trans awareness training in partnership with Allsorts Youth Project.

Email pshe@brighton-hove.gov.uk or TransToolkit@brighton-hove.gov.uk to request support.

6.3 Allsorts Youth Project

Allsorts Youth Project provides support to LGBT+ and exploring children and young people in schools. Allsorts Youth Project believes that young LGBT+ people deserve to feel safe and thrive at home, at school and in their communities.

For information and advice related to individual children, young people and their families please email youth@allsortsyouth.org.uk

6.4 Brighton & Hove Inclusion Support Service (BHISS)

Contact for referrals for any mental health and wellbeing needs.

BHISS@brighton-hove.gov.uk

<https://www.beem.org.uk/Services/1695>

6.5 Front Door for Families

The service is made up of professionals with different areas of expertise who work together to assess, decide and coordinate how best to support children, young people and their families where there are concerns.

Email the team at FrontDoorforFamilies@brighton-hove.gov.uk

Telephone 01273 290400 during working hours (9am to 5pm, Monday to Thursday and 9.00am to 4.30pm on Fridays).

Outside of our working hours please contact the Emergency Duty Service on 01273 335905 or 01273 335906.

Appendix 1 Relevant Law and Guidance

This section highlights provisions that schools might find particularly relevant and/or useful.

Gender reassignment is defined at section 7 of the Equality Act 2010:

A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.¹⁵

In *R (AA) v NHS England* [2023] EWHC 43 (Admin); [2023] PTSR 60 the High Court adopted a broad construction of section 7, stating:

133. But there is no reason of principle why a child could not satisfy the definition in s. 7, provided that they have taken a settled decision to adopt some aspect of the identity of the other gender. Many of the children referred to children's GID services will have taken such a decision. Determining whether any particular child has the protected characteristic of gender reassignment will involve a case specific factual assessment."

The wording from the [EHRC Technical Guidance for Schools](#), paragraphs 5.113 to 5.116, outlines the conditions to be recognised as having the protected characteristic of gender reassignment and that this applies to a child:

- 5.113 *Gender reassignment means proposing to undergo, undergoing or having undergone a process to reassign a person's sex.*
- 5.114 *To be protected from gender reassignment discrimination, a person does not need to have undergone any medical treatment or surgery to change from their birth sex to their preferred gender.*
- 5.115 *A person can be at any stage in the transition process, from proposing to reassign sex, undergoing a process of reassignment, or having completed it. It does not matter whether or not a person has applied for or obtained a Gender Recognition Certificate, which is the legal document that enables trans people aged 18 and over to have their acquired gender recognised as their legal sex.*
- 5.116 *A child can have the protected characteristic of gender reassignment.*

The [Department for Education's Equality Act 2010: advice for schools](#) further states:

This definition means that in order to be protected under the Act, a pupil will not necessarily have to be undertaking a medical procedure to change their sex but must be taking steps to live in the opposite gender or proposing to do so.¹⁶

Other potentially relevant protected characteristics are:

- "religion or belief" (pursuant to Equality Act 2010 s 10 "Religion means any religion and a reference to religion includes a reference to a lack of religion" and "Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief");

¹⁵ Section 7 of the Equality Act 2010 <https://www.legislation.gov.uk/Kupa/2010/15/section/7> (Retrieved 19.5.20)

¹⁶ Equality Act; Advice for Schools (2018) p17 <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> (Retrieved 19.5.20) and re-stated <https://commonslibrary.parliament.uk/research-briefings/cbp-8969/>

- “sex” (pursuant to Equality Act 2010 s 11 “a reference to a person who has a particular protected characteristic [of sex] is a reference to a man or to a woman” and s 212 provides that “‘man’ means a male of any age” and “‘woman’ means a female of any age); and
- “sexual orientation” (Equality Act 2010 s 12 provides that “Sexual orientation means a person's sexual orientation towards— (a) persons of the same sex, (b) persons of the opposite sex, or (c) persons of either sex.”)

Chapter 1 of Part 6 of the Equality Act 2010 concerns schools. Section 85, titled ‘Pupils: admission and treatment, etc’, sets out prohibited conduct against children and young people in relation to protected characteristics.

Types of prohibited conduct include:

- Direct discrimination (defined in section 13)
- Indirect discrimination (defined in section 19)
- Harassment (defined in section 26)
- Victimisation (defined in section 27)

Section 13 defines “Direct discrimination” as follows: “A person (A) discriminates against another (B) if, because of a protected characteristic, A treats B less favourably than A treats or would treat others.” Unless there is a specific statutory provision which permits less favourable treatment because of a protected characteristic, “direct discrimination” will not be lawful. In the absence of such a statutory defence, it will not be relevant if A considers that the treatment in question is justified.

Pursuant to section 19, “indirect discrimination” arises if a person (“A”) applies a “provision, criterion or practice” to B and others and “which puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it” and “[the provision, criterion or practice] puts, or would put, B at that disadvantage,” The application of the relevant “provision, criterion or practice” will, however, only be unlawful if A “cannot show it to be a proportionate means of achieving a legitimate aim” (see s 19(2)(d)).

The Equality Act 2010 contains exceptions. Section 85(10) provides that the protected characteristics of gender reassignment, religion or belief and sexual orientation are not protected characteristics for the purposes of the prohibition on harassment in section 85(3). Further exceptions in relation to education are set out in Part 2 of Schedule 3.

In addition to the substantive duties under the Equality Act 2010, the Public Sector Equality Duty (‘the PSED’), in section 149 requires the responsible body of schools to show due regard to the need to :

- Eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act.
- 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.

It also requires schools to have equality objectives and information published on their websites.

Schools should consider equality implications when developing policy and taking decisions, not as an afterthought, and the equality implications should be kept under review.

The Department for Education Advice on the Equality Act 2010 states:

It is good practice for schools to keep a written record to show that they have actively considered their equality duties and asked themselves relevant questions. There is no legal requirement to produce a formal equality impact assessment document, although for key decisions this might be a helpful tool.¹⁷

Under the Ofsted Education Inspection Framework (2023):

“Inspectors will assess the extent to which the provider complies with the relevant legal duties as set out in the Equality Act 2010 including, where relevant, the Public Sector Equality Duty and the Human Rights Act 1998.”¹⁸

Evidence Ofsted will use to evaluate the impact of leaders’ work includes:

“the board of governors or the board of trustees are responsible for ensuring that the school fulfils its statutory duties, for example under the Equality Act 2010, and other duties, for example in relation to the ‘Prevent’ duty. The board of governors or the board of trustees are also expected to exercise strategic oversight of all aspects of safeguarding. When inspectors consider whether the board of governors or the board of trustees are fulfilling this responsibility, they are not expected to construct or review a list of duties.”¹⁹

To be judged as good, “Governors or trustees ensure that the school fulfils its statutory duties, for example under the Equality Act 2010”.

Inspectors will make a judgement on behaviour and attitudes by evaluating the extent to which the school is:

Creating an environment in which pupils feel safe, and in which bullying, discrimination, sexual harassment, sexual abuse and sexual violence – online or offline – are not accepted and are dealt with quickly, consistently and effectively whenever they occur.²⁰

¹⁷ Equality Act; Advice for Schools (2018) <https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

¹⁸ Ofsted, The education inspection framework (2023) <https://www.gov.uk/government/publications/education-inspection-framework>

¹⁹ School inspection handbook - GOV.UK (www.gov.uk) (372)

²⁰ School inspection handbook - GOV.UK (www.gov.uk) (312)

Appendix 2 Confidentiality and information sharing

Many parents and carers of trans children and young people will be involved in working in partnership with the school and their child to appropriately plan and deliver support and the working assumption should be that any planning is done in partnership. Schools will encourage children and young people to talk with their parents and carers about being trans, including offering to talk with the parent or carer on the child's behalf. The only exceptions would potentially be where there are safeguarding concerns and involving parents or carers would constitute a risk of harm to the child or young person. If a school is concerned that such circumstances may arise, further advice should be sought.

When a child or young person initially discloses that they are trans, it is important to talk to them about confidentiality and who, if anyone, they would like information to be shared with. It is best practice for the member of staff to make clear that they will need to share the information with at least one other member of trained staff and then discuss who else will be told from there. In line with pastoral policies, it would be good practice to keep a record of support provided to trans children and young people. Parents and carers should not be excluded from decisions taken by a school or college. Where children or young people are not comfortable discussing this with their parents or carers, the school should explore ways to support this conversation with them unless there is evidence that doing so would place the child at risk of harm. Information about a child or young person's trans status, legal name, or sex registered at birth should not be shared without permission or unless there is a legally permissible reason to do so. Schools should follow their usual policies related to information sharing to support the wellbeing of a child or young person.

In keeping with safeguarding policies, confidentiality should only be broken to safeguard a child or young person.

Schools should consider school and college photos and websites to ensure that these images do not reveal any confidential information. If images and names are not protected, they may be used later in the trans person's life to 'out' them as trans. Ensure that the child or young person (and their parents and carers if appropriate) are aware of these risks and consent accordingly. Under General Data Protection Regulations (GDPR) individuals also have the right to have personal data removed.

All people, including children and young people, have a right to privacy. Staff should not discuss trans or gender exploring children and young people outside of school with friends or family members. The trans community is such a small one that even a casual reference to a child or young person might compromise confidentiality.

2.1 UK General Data Protection Regulations (GDPR)

Schools are required to comply with the UK General Data Protection Regulations (GDPR) in respect of all children and young people (data subjects) and personally identifiable information relating to individuals. They will be aware of the regulations in relation to processing and sharing of personal data. Such data includes any information that can identify a person, or their family and this sort of data remains "personal" even if an individual chooses to publicise it.

Under the UK GDPR Article 9, 'special category data' relates to more sensitive topics which may pose a risk to people's privacy, and which can only be processed under certain conditions. This [guide](#) from the UK Information Commissioner's Officer (ICO) provides further information on this data.

The UK GDPR does not prevent processing or sharing of personal information, but requires that when we do so, we must have a specific and limited purpose for doing so; ensure that the data used is proportionate to that purpose and ensure that data is stored and shared securely. Where personal data is of special category (such as medical/mental health, sexual orientation or gender identity) there are additional controls around when it can be lawfully

processed. This will be allowable where there is legal duty to do so or where processing meets a substantial public interest such as safeguarding.

For a list of recognised substantial public interests, refer to Schedule 1, Part 2 of the Data Protection Act 2018 and also the ICO guidance on processing of special category data.

Appendix 3 Definitions

The following terminology is helpful to understand. Definitions have been taken from the sources indicated. The definitions relating to gender identity should not be conflated with the term 'gender reassignment' under section 7 Equality Act 2010.

Bullying including hostility toward people perceived as transgender.

"Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences."²¹

Transgender bullying can occur when the behaviour is reasonably perceived, by the victim or any other person, to be motivated by a hostility or prejudice against a person who is transgender or perceived to be transgender.

An individual may also experience transphobic bullying as a result of perceptions that a parent, relative or other significant figure does not conform to stereotypes about gender expression or is trans.

Hate crimes.

Crimes can be prosecuted as a hate crime if the offender has either:

- demonstrated hostility based on race, religion, disability, sexual orientation or transgender identity.

Or

- been motivated by hostility based on race, religion, disability, sexual orientation or transgender identity.

The police and the CPS have agreed the following:

There is no aggravated offence of homophobic, biphobic or transphobic hate crime but [s.66 Sentencing Act 2020](#) imposes a duty upon courts, when considering the seriousness of an offence, to treat as an aggravating factor that either:

- at the time of committing the offence, or immediately before or after doing so, the offender demonstrated hostility towards the victim based upon the sexual orientation (or presumed sexual orientation) of the victim or based upon the victim being (or being presumed to be) transgender; or
- the offence was motivated (wholly or partly) by hostility towards persons who are of a particular sexual orientation or who are transgender.

²¹ Preventing and Tackling Bullying, DfE 2017

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf (Retrieved 07.11.24)

“Hostility is not defined... Consideration should be given to ordinary dictionary definitions, which include ill-will, ill-feeling, spite, prejudice, unfriendliness, antagonism, resentment, and dislike.”²²

Gender dysphoria

Gender dysphoria is a term that describes a sense of unease that a person may have because of a mismatch between their biological sex and their gender identity. This sense of unease or dissatisfaction may be so intense it can lead to depression and anxiety and have a harmful impact on daily life²³. “Gender dysphoria is commonly used in research publications, as well as clinical settings. It is also most likely to be familiar to the lay public since it has been used widely in mainstream and social media. Like depression, it is a label that is used colloquially to describe feelings, as well as being a formal diagnosis.”²⁴

Gender identity

The World Health Organisation states that: Gender refers to the socially constructed characteristics of women and men – such as the norms, roles and relationships that exist between them. Gender expectations vary between cultures and can change over time. It is also important to recognise identities that do not fit into the binary male or female sex categories. Gender norms, relations and roles also impact the health outcomes of people with transgender or intersex identities.²⁵

The Independent Review of Gender Identity Services for Children and Young People states: This term is used to describe an individual’s internal sense of being male or female or something else.²⁶

Gender incongruence

This is the term used to describe “a marked and persistent incongruence between an individual’s experienced gender and the assigned sex”²⁷. It is not a mental health disorder. It does not include references to dysphoria or dysfunction.

Cisgender or cis

²² : <https://www.cps.gov.uk/legal-guidance/homophobic-biphobic-and-transphobic-hate-crime-prosecution-guidance> (retrieved 7.11.24)

²³ NHS [Gender dysphoria - NHS \(www.nhs.uk\)](https://www.nhs.uk)

²⁴ <https://cass.independent-review.uk/home/publications/final-report/>

²⁵ World Health Organisation [Gender and health \(who.int\)](https://www.who.int)

²⁶ <https://cass.independent-review.uk/home/publications/final-report/>

²⁷ International Classification of Diseases, Eleventh Revision (ICD-11) (World Health Organization, 2022) (<https://icd.who.int/browse/2024-01/mms/en#344733949>)

Someone whose gender identity is the same as the sex they were registered as at birth. Non-trans is also used by some people.²⁸

Gender expression

How a person chooses to outwardly express their gender, within the context of societal expectations of gender. A person who does not conform to societal expectations of gender may not, however, identify as trans.²⁹

It is very usual for children to experiment and explore through dressing up. Many children will 'dress up' in clothes which are seen as stereotypically intended for a different gender and this alone would not mean they were trans. All children and young people should be free to explore their gender expression without having their gender identity questioned.

For example, a boy wearing a dress does not signify that he is a girl, regardless of whether the boy is a cis boy or a trans boy. Schools can play a part in normalising for example boys having long hair or wearing jewellery without assumptions that they are gay or trans.

Any prejudice expressed to a child, young person or adult because of their gender expression (for example, what they are wearing) or because they are gender non-conforming should be challenged.

Gender stereotypes

UNICEF define this as "Ascribing certain attributes, characteristics and roles to people based on their gender."³⁰

Whilst there is nothing wrong with a person's gender identity and or gender expression being stereotypical, gender stereotyping becomes harmful when it limits an individual's capacity to develop, make choices and pursue careers outside of a stereotype. UNICEF states, "Gender stereotyping becomes harmful when it limits a person's life choices, such as training and professional path, and life plans."³¹

The wellbeing of boys and girls can be harmed by stereotyping³². All schools will want to prevent and challenge gender stereotypes and give the message that there are many ways to be a girl or a boy. This approach will be of benefit to the wellbeing and aspirations of all children and young people and contribute to reducing and preventing sexism, homophobia, biphobia and transphobia. This work will also benefit trans and non-binary children and young people as unrealistic expectations about what it means to be a man, woman, boy or girl in society can do harm to those who don't conform to the gendered expectations placed on them.

²⁸ Stonewall <https://www.stonewall.org.uk/list-lgbtq-terms>

²⁹ Stonewall Glossary <https://www.stonewall.org.uk/list-lgbtq-terms>

³⁰ [Gender equality: GLOSSARY OF TERMS AND CONCEPTS \(unicef.org\)](https://www.unicef.org/gender-equality/glossary)

³¹ [Gender equality: GLOSSARY OF TERMS AND CONCEPTS \(unicef.org\)](https://www.unicef.org/gender-equality/glossary)

³² The Children's Society How gender roles and stereotypes affect young people
<https://www.childrenssociety.org.uk/what-we-do/blogs/how-gender-roles-affect-young-people>

Intersex or differences in sex development (DSD)

“Intersex people are individuals whose anatomy or physiology differ from contemporary cultural stereotypes of what constitute typical male and female”³³. “Differences in sex development (DSD) is a group of rare conditions involving genes, hormones and reproductive orders, including genitals. It means a person’s sex development is different to most other people’s”³⁴.

Non-binary

“An umbrella term for people whose gender identity doesn’t sit comfortably within ‘man’ or ‘woman’. Non-binary genders and identities are varied and can include people who identify with some aspects of binary identities, while others exist outside of those categories entirely.”³⁵ Non-binary people may use the pronoun ‘they’ but may also use ‘he’, ‘she’ or another pronoun. Pronouns do not equal gender, for example a person may be a non-binary gender but use ‘he’ or ‘she’ pronouns.

Orientation

“Orientation is an umbrella term describing a person's attraction to other people. This attraction may be sexual (sexual orientation) and or romantic (romantic orientation). These terms refer to a person's sense of identity based on their attractions, or lack thereof.”³⁶ Trans people, like everyone else, can have a range of sexual orientations.

Sex

Sex is a protected characteristic in the Equality Act 2010 (section 11) and refers to a male or a female of any age. In relation to a group of people it refers to either men and/or boys, or women and/or girls: see sections 11 and 212(1) Equality Act 2010 and [2.55] of the Equality and Human Rights Commission’s ‘Services, public functions and associations Statutory Code of Practice’.

Trans boy or man

A person registered female at birth and whose gender identity is that of a boy or a man.

³³ The UK Intersex Association <http://www.ukia.co.uk/about.html>

³⁴ NHS [Differences in sex development - NHS \(www.nhs.uk\)](http://www.nhs.uk)

³⁵ Stonewall <https://www.stonewall.org.uk/list-lgbtq-terms>

³⁶ Stonewall <https://www.stonewall.org.uk/list-lgbtq-termshttps://brightonandhovecc.sharepoint.com/sites/GRPPSHEEducationBrightonHove-TransToolkitDevelopment/Shared Documents/Trans Toolkit Development/Version 5 draft/Stonewall>

Trans girl or woman

A person registered male at birth and whose gender identity is that of a girl or woman.

Transition

“The steps a trans person may take to live in the gender with which they identify. Each person’s transition will involve different things. Transitioning might involve things such as telling friends and family, dressing differently and changing official documents.”³⁷ For some it may also involve medical intervention, such as puberty blockers, hormone therapy and surgeries, but not all trans people want or are able to have this. A young trans person cannot have surgery in the UK until they are an adult.

³⁷ Stonewall <https://www.stonewall.org.uk/list-lgbtq-terms>

Appendix 4 Guide to challenging homophobic, biphobic and transphobic language and gender stereotyping: a range of responses.

It is best practice for schools to think about how harmful prejudice-based language should be challenged and recorded. How the challenge is made will depend on the circumstances of the incident, ensuring balanced approach is taken, the severity of the incident, who it involves, where it takes place and the intention behind the comment. Further guidance available on www.BEEM.org.uk.

Below are some examples of the approaches schools might take depending on the circumstances when navigating the difference between freedom of expression and promoting a safe atmosphere for all students to feel welcome and so thrive.

Possible Organisational response

- In our school we treat everyone with respect and when you use 'gay' like that it is disrespectful to gay people.
- The ground-rules we agreed at the beginning of the session said we would show respect to each other.
- The anti-bullying policy says that homophobic, biphobic and transphobic language is not acceptable.
- The school policy says that we are all responsible for making this a safe place for everyone. Language, which is homophobic, biphobic and transphobic makes people feel unsafe.
- At this school we don't limit our expectations of each other, so we try to avoid gender stereotypes.

Questioning, exploring and explaining

- What do you think that word means?
- What makes you think that?
- Do you realise that what you said is sexist, homophobic, biphobic and transphobic?
- Do you understand what the law says about LGBT people?
- Can you explain what you mean by calling something 'gay'?
- That word is an insulting term for someone who is trans. Do you know what it means to be trans?
- How would you feel if someone spoke about you in that way?
- Do you know what a gender stereotype is? Can you think of why some people might be upset when they hear them at school?

Confronting response

- Language like that is not acceptable.
- You might not think that remark is offensive, but many would.
- What you are saying presents a very stereotypical view of what men and woman are like. When you do that, it means that people who don't fit into your way of seeing things can feel left out or ashamed.

Personal response

- I'm not happy with what you said.
- Sexist, homophobic, biphobic and transphobic offends me. I don't want to hear it again.

- What you've said really disappoints / upsets / angers me. I hoped you would recognise that it is important to treat everyone with respect and that it is therefore wrong to use such as sexist, homophobic, biphobic and transphobic language.
- I'm really surprised and disappointed to hear you say that. I hoped you would recognise that it is important to treat everyone with respect, and that it is therefore wrong to use such sexist, homophobic, biphobic and transphobic language.

Appendix 5 A trans inclusive approach to policies

Policy	Examples of potential approaches that are trans inclusive (read relevant sections of this toolkit to further inform writing of relevant policy section)
Equality Policy	This should be in line with the Equality Act 2010 and reference gender reassignment as a protected group. All policies should include the protected characteristic of sex as well as gender reassignment. This policy could reference this <i>Trans Inclusion Schools Toolkit</i> by saying for example that the setting works within the guidance provided by Brighton & Hove City Council.
Anti-Bullying Policy	Include reference to sexist, homophobic, biphobic and transphobic bullying (alongside bullying of all groups with protected characteristics) and explain how both bullying and discriminatory treatment are recorded by type, analysed and monitored.
PE and Physical Activity Policy	Include detail on what is in place to ensure all those using changing rooms are kept safe. Include how trans children and young people will be supported to participate in PE and physical activity (including swimming) and enabled to access changing facilities where they feel safe. Include how changing facilities will be managed for away fixtures.
School visits, trips and residential policies	Include how children and young people will be supported to participate in residential trips. Include how discussions will be had with trans children and young people and their families to support this.
PSHE Education policies	Include how the PSHE curriculum (including statutory relationships, sex and health education) will support understanding of trans identities and be inclusive of trans children and young people.
Uniform Policy	Uniform items are listed without reference to gender. A statement is included to cover approved changes to swimming costumes for trans children and young people and others for whom adjustments are needed such as those from faith backgrounds.
Safeguarding, Confidentiality, Data Protection	As appropriate these explain how changes are made to personal information and make clear that: Being trans is not a safeguarding issue. Commitment to not 'outing' trans members of the community without their permission unless there are safeguarding reasons for doing so
Special educational needs and disabilities policies / School Offer	Include the statement that SEND children and young people are just as likely to be trans or gender exploring as any other person and signpost to support their needs.
Teaching and learning / behaviour policies	These actively discourage unnecessary grouping or seating by sex, whilst making clear how single sex groupings will be sensitively managed when deemed necessary to support learning or needs of a particular group. These policies will also encourage approaches which are inclusive, representative of the community and prevent and challenge sexism, homophobia, biphobia and transphobia.

Appendix 2

Consultation summary

The consultation ran from 23 July 2024 to 11 October 2024 through the online platform Your Voice. The consultation related to the redrafted toolkit published in July,

The Toolkit now found at Appendix 1 has since been further amended, informed by the results of the consultation, the results of which are now summarised in this document

A total of 448 consultation responses were received, all of which have been read by the officers who have updated the Toolkit further.

All responses in full, including written submissions, are being made available to Cabinet as background papers.

Organisation responses from:

BHISS, Brighton Women's Liberation Collective, B&H LGBT Switchboard, Diocese of Arundel and Brighton, PSHE Brighton, four primary schools, The Clare Project, The Proud Trust, The Queery, Transgender Trend, a College

4 other written submissions:

Letter from an MP
Letter from a secondary school governing board
Letter from a primary school governing board
Allsorts parents

Introduction

This document will seek to reflect the outcome of the different elements of the consultation process.

There were responses from a variety of stakeholders as follows:

Parents and carers: 216
Young people: 70
Teachers: 32
Support staff: 24

Other responses came from organisations and interested individuals.

158 respondents have a child or children at a Brighton and Hove School.

It is important to acknowledge the significant variation in responses between different groups. Consequently, we are presenting the outcomes from multiple perspectives to offer a more nuanced understanding of the consultation's findings. While the responses from each group exhibited

consistency across most survey questions, we have highlighted areas that garnered significant written feedback and those particularly pertinent to individual groups.

It is evident some of the responses were copied from master or shared sets of answers. We have included these, but only once.

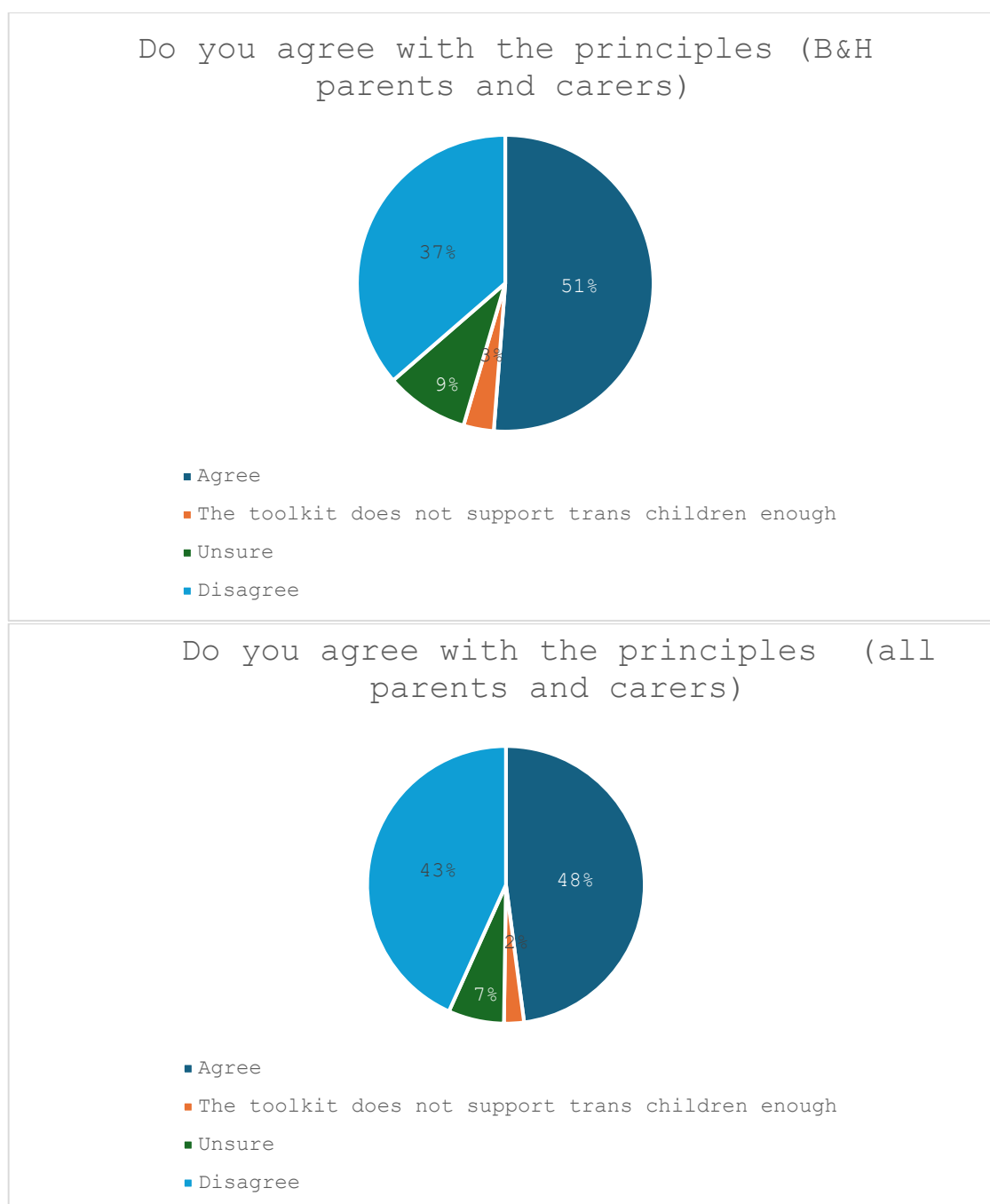
Where individuals expressed disagreement with specific sections of the toolkit, a notable proportion indicated this was due to a desire for increased support for transgender children. To accurately reflect these sentiments, responses that stated 'no' but clearly advocated for greater support for transgender children have been categorised as 'The toolkit does not support trans children enough'.

We have used respondents' words in this summary.

Parents and Carers

159 respondents were from a B&H postcode, whilst 57 were from outside the city.

Principles



In general parents and carers were more supportive of the principles than not.

Many of the respondents that commented in this section were parents of trans children who felt the toolkit principles were clear and important. Several talked about the toolkit offering their child support, making school a better place.

'As a mother to a nine-year-old trans child, I agree with all these points. I would suggest adding some information that emphasises the vital importance of supporting children in expressing their gender identity at home and at school, as not doing so risks poor mental health outcomes for the child. We have seen such a positive change in our child since they began to wear the clothes

corresponding to their gender identity at school and changed their name and pronouns. My child is confident at school and feels happy in their skin but this was not the case before their social transition. There are also some studies emphasising this:

<https://www.tandfonline.com/doi/full/10.1080/26895269.2024.2359934#abstract>

'The toolkit being in place has been supportive of my child & their mental health'

'It is helpful that the toolkit seems to come from the starting point of helping schools to support some of their most vulnerable children, i.e. trans children. It is good that it is explicit that decisions should be made on a case by case basis, so trans kids can get the support they need.'

A significant number of negative responses were rooted in the belief that transgender children do not or cannot exist in law and that school staff, as non-clinicians, are not qualified to make relevant decisions. Several respondents also expressed the view that the guidance was not legally sound. *'I do not think our teachers, governors and educators are in a position to make clinical decisions.'*

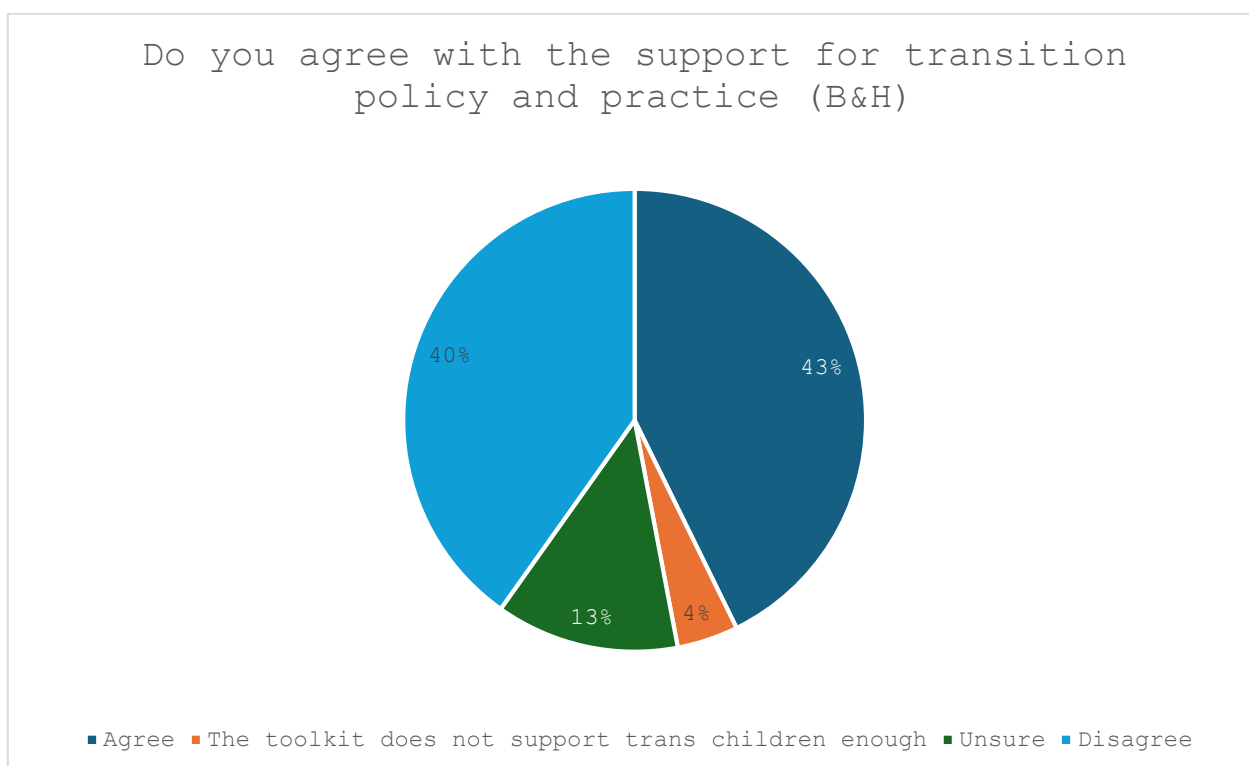
'Schools and colleges are not clinically qualified to decide if a child is 'trans'.'

'BHCC teaching and any payrolled staff are being guided to make clinical decisions and prescribe interventions'.

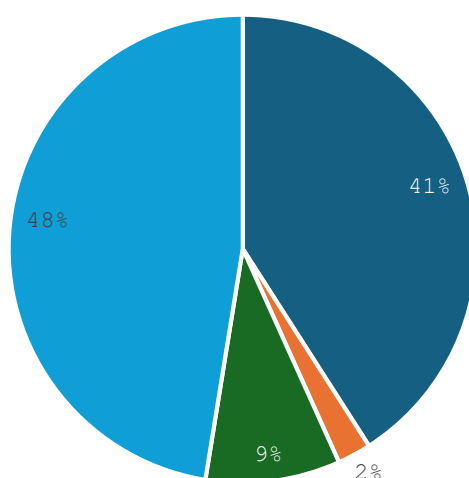
'Firstly no child is legally 'trans'.'

' Children should be put first not their parents,, the toolkit states otherwise'

Support for developing policy and practice regarding the transition of trans children



Do you agree with the support for transition policy and practice?



■ Agree ■ The toolkit does not support trans children enough ■ Unsure ■ Disagree

This was an area of the toolkit that attracted a lot of comments. Again, there is a difference in response between Brighton & Hove parents and carers and those from outside the city.

A significantly smaller number of written comments accompanied supportive responses. Those that were included highlighted the importance of clear policies and practices for transgender children and their families.

'It is so important that families do not feel restricted in supporting their child by schools. Children of all ages should have the freedom to transition.'

'The guidance is clear and lucid and does not pay any credence to unhelpful myths and stereotypes about trans young people.'

'The draft DfE guidance sets out to hinder the transition of children at primary schools. This is harmful to transitioning children as it teaches them and their peers that their true identity is not acceptable to trusted adults i.e. teachers.'

'Our primary school has drawn heavily on the previous version of the trans inclusion toolkit to support our transgender daughter. It has been very important for her wellbeing to be recognised as and treated as a girl at school.'

Many of the 'not sure' responses appeared to be broadly in favour of the toolkit but were less sure of the wording or approach and felt more clarification was needed.

'In my experience a lot of people equate "transition" with medical transition and are unclear about the various gradients involved in a social transition. This should be made clearer in the toolkit.'

'For the most part there is a high level of advice. But the toolkit is very clear that an individualised approach should be used in each case. This does appear to leave a school with decisions to make on it's own. Which I do think is correct as school staff will know each child well. What isn't clear

without a well defined national policy is to what extent the school, senior leadership and governing bodies would be liable if a legal challenge to policy and practice was launched.'

'Not sure how "watchful waiting" can be implemented without a parent putting off or ignoring children who tell them they are trans.'

'I'm concerned that sections 3.2 and 3.3's references to the Cass Report could be misinterpreted by gender-critical individuals and used to prevent young children from expressing their gender at school.'

Some of the more negative comments did not appear to relate directly to the content of the toolkit . *Absolutely terrifying that you are considering supporting children to write letters saying that they have 'always been a boy/girl'.*

Several negative comments referenced mental illness, gender dysphoria, and comorbidities, suggesting that teachers should not be involved in decision-making and that these matters should be handled by Child and Adolescent Mental Health Services (CAMHS) or mental health nurses. There was concern that parents might not be informed.

'this is a sensitive political area, we know children have been harmed beyond repair and schools have been complicit with transitioning children. We are in a period of change as more and more can see the physical harm done to children by irreversible transition and schools need to be really clear with their guidance and help teachers and governors to have a clear unified response. this is weak sauce and doesn't help them. Don't hang them out to dry. Be braver and clearer.'

Some respondents considered that individuals must have undergone surgery to before having a protected characteristic under the Equalities legislation and expressed the view that children cannot be transgender.

‘

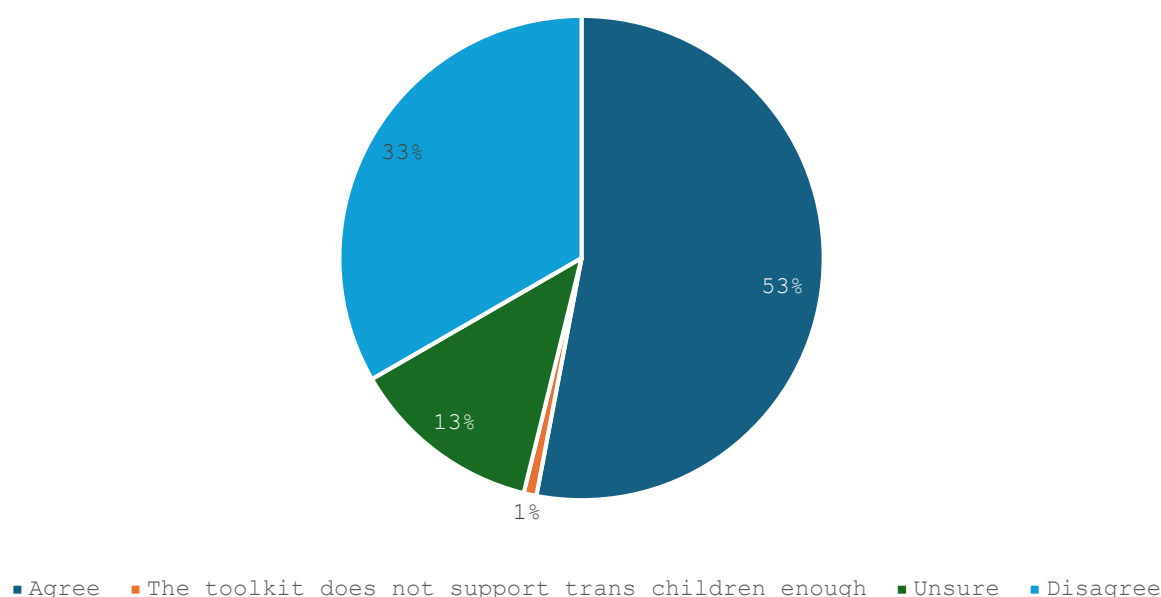
Some “no” responses appear to consider the guidance was not supportive enough of trans young people: :

'Too much is drawn from contentious non statutory guidance and national reviews which do not have to have any bearing on the approach taken by the city council. Previous guidance provided an affirming approach to helping trans+ children and young people. This guidance unnecessarily delivers a damaging and life limiting approach to trans+ CYPs lives and needlessly uses non-statutory guidance to do this, where the city has a wealth of evidence and learning to counter that. This should have been drafted with the involvement of trans+ people.'

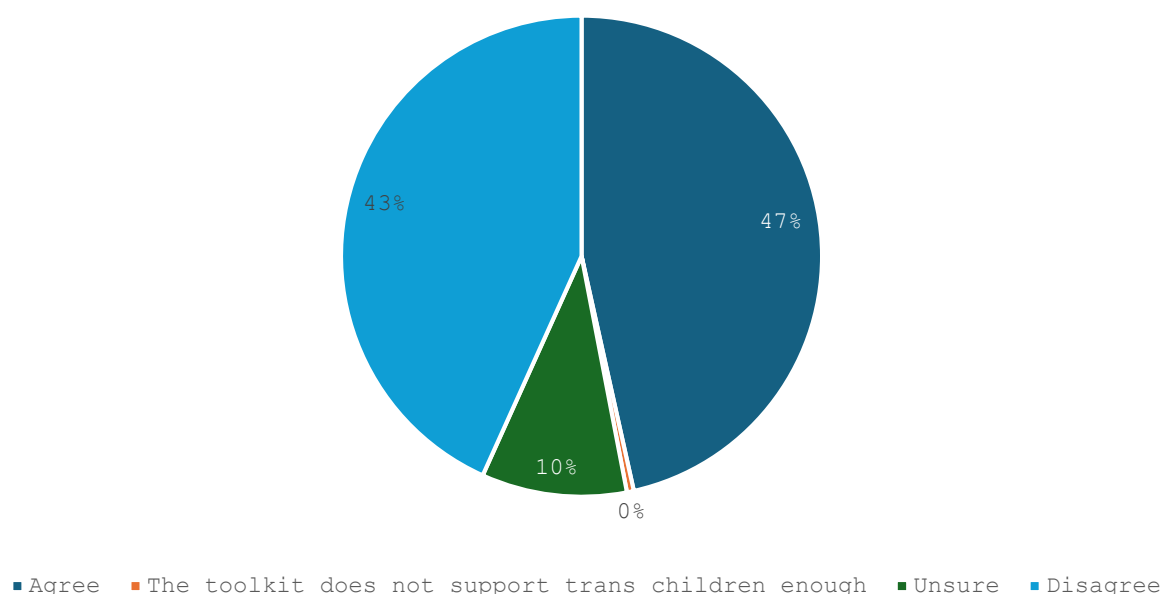
'Trans children are not a threat to girls. Again children have the right to privacy and autonomy and should be put first - not their parents.'

Supporting additional considerations

Supporting Additional Considerations (B&H parents)



Supporting Additional Considerations



A few comments implied a link between the number of SEND children who are transgender, especially autistic children, and questioned the toolkit's guidance on protecting these children, and the limited explanation of the perceived danger. Several parents of both cisgender and transgender children asserted that, irrespective of any additional needs or vulnerabilities, all facets of a child's identity should be respected.

'My cis daughter is autistic and I like that it doesn't assume that this is a learning or developmental disability and that she is clear on who she is. I have confidence that other autistic children who tell us who they are should be treated with dignity rather than people dismiss their identity because of their disability. Disabled people can be LGBTQ.'

'I think this is a hugely important part of the toolkit. As a parent of BAME children with SEN i am worried about how they can be marginalised; this section seeks to support schools to understand the needs of such pupils in a more considered way.'

Other comments argued for the need for more information and detail :

'This is a great example of the cart leading the horse. Autistic children are more likely to seek some explanation via a trans identity and are especially vulnerable. There is not enough information on this, rather this section suggests that the autism should be less of a factor than the 'trans-ness'.'

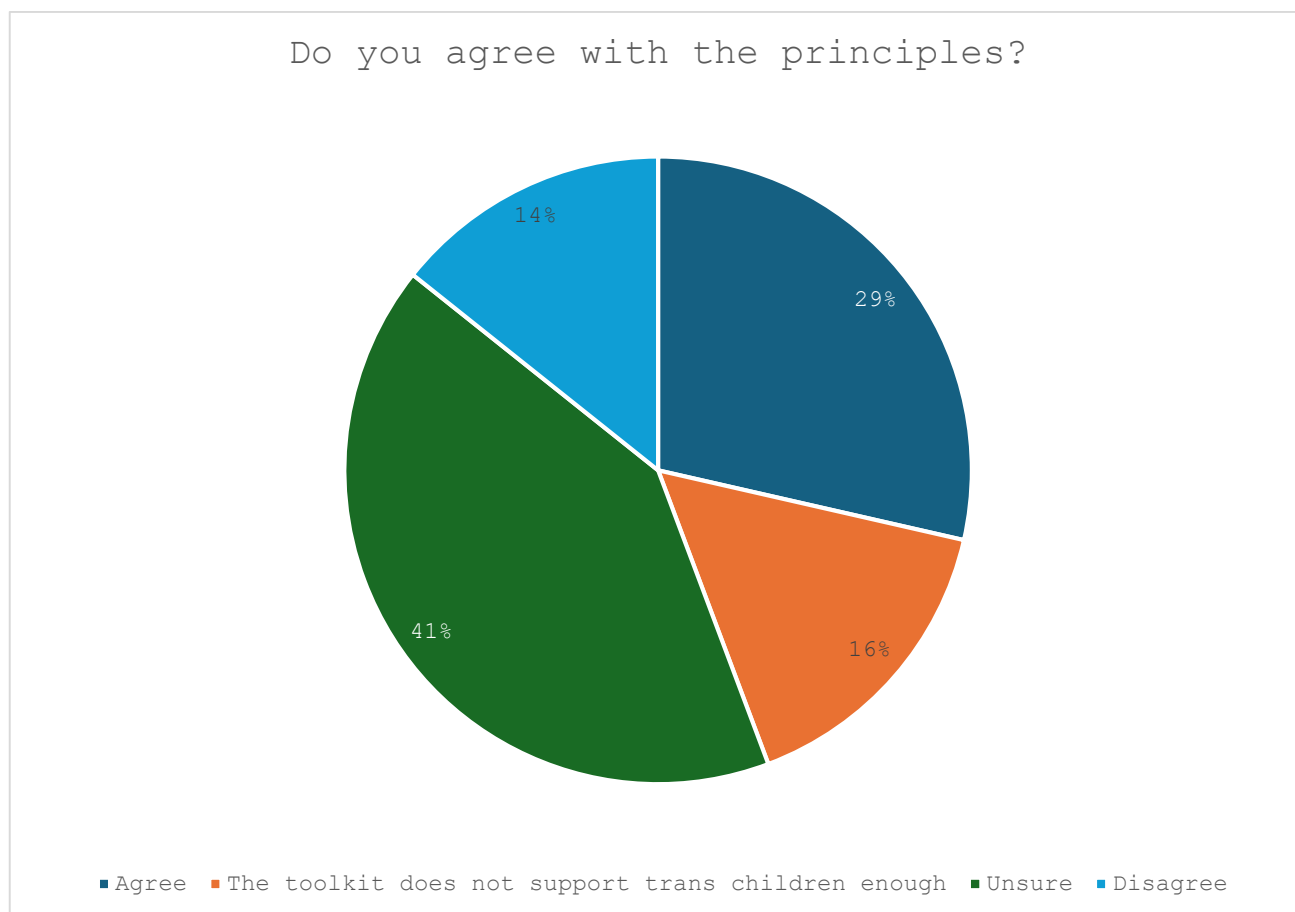
'By failing to recognise the complex and improperly understood relationship between ADHD/ASF and gender dysphoria, the toolkit adopts an approach which potentially causes harm to these children, and is potentially unlawfully discriminatory.'

Young People

70 responses were received from young people. A few responses were clearly not young people (for example one response stated they were a grandparent). Overall, only a small proportion of young people were negative about the toolkit without giving a reason.

Written criticisms centre around the toolkit not going far enough in providing support to trans children. There were no clear written arguments against the redraft aside from this point of view.

Principles



Most were broadly supportive of the principles, with the main point of contention being the involvement of parents and carers. Many young people expressed the view that children and young people should have the right to explore their identity without the involvement of their parents or carers.

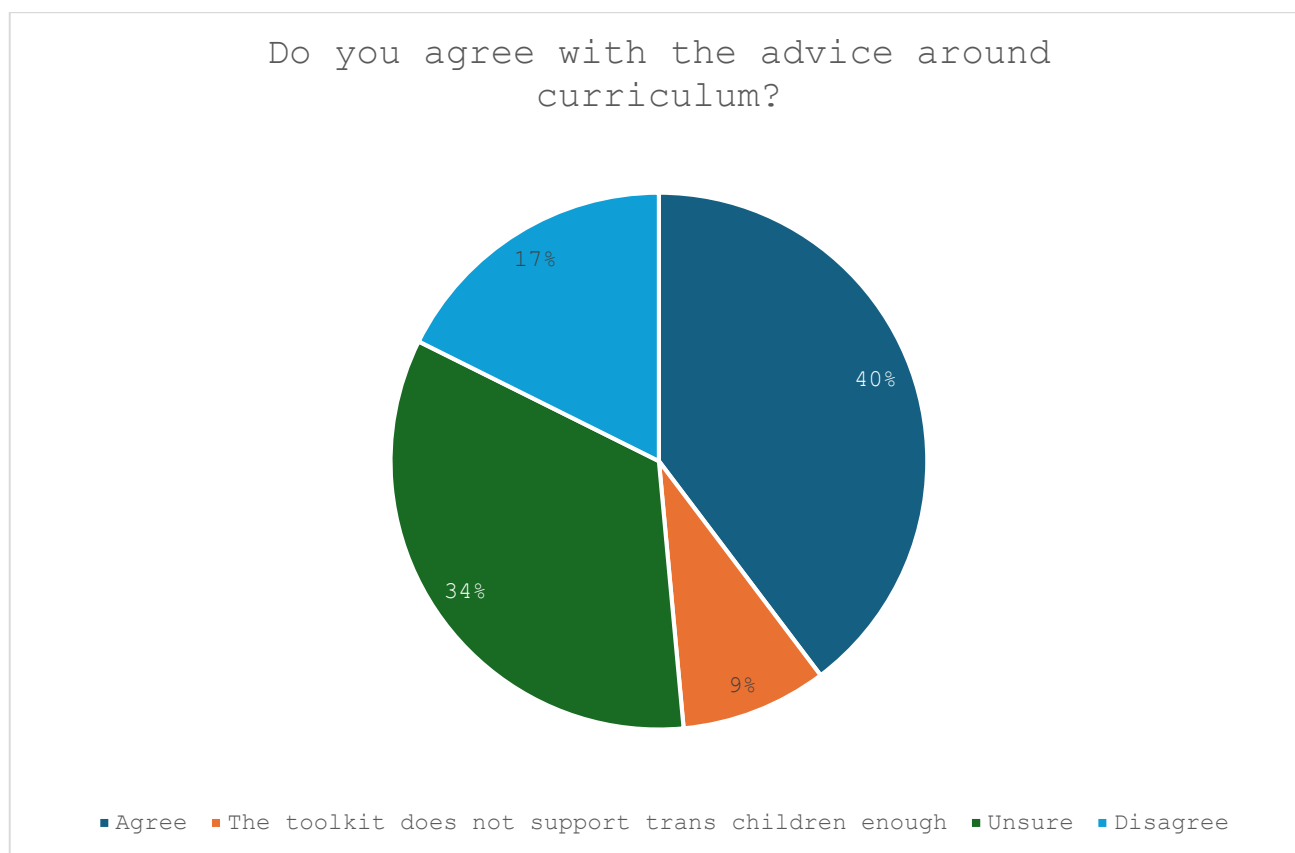
the family and parents should only be contacted under the consent of the child, the parents can be transphobia and not know best or even harm the child

I agree with most of it, however parents/families of children should not always be directly involved. Outing trans and gender questioning children to the parents could be exposing them to dangerous and harmful environments by unaccepting or abusive parents. Schools should be providing a safe space for children to discover their identity with their own freedom and autonomy.

Some also expressed their concerns that questioning identity could be seen as a safeguarding issue:

Being trans is not a safeguarding issue.

Curriculum



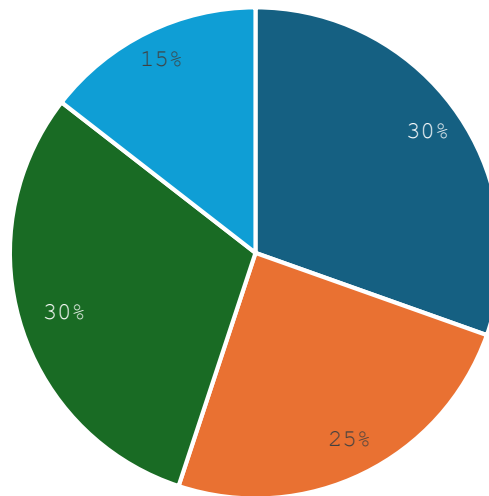
The comments in this section broadly focus on ensuring a more inclusive approach to education.

I find it biased for the toolkit to give more examples and weight to excluding trans kids from sex based groups than it does for including them; there are many reasons and situations where inclusion is more appropriate. Including education about trans kids in the curriculum is essential, using equality calendar events is a nice way to achieve this. Representing trans people in a range of scenarios is very valuable.

I reject a few of the points here. Especially the one about keeping young people from debating topics that involve religion and/or gender. I think this section will be relatively effective in helping some new teachers, but this toolkit is still based on the Cass review so how can someone take the advice given without questioning how accurate and effective it will be, when so many different organizations and respected healthcare personnel have rejected the Cass review.

Support for developing policy and practice regarding transition of trans children

Do you agree with support for transition policy and practice



■ Agree ■ The toolkit does not support trans children enough ■ Unsure ■ Disagree

There were many comments in this section arguing the toolkit was not supportive enough, was “too conservative” and made too much reference to the Cass review.

It does not take into account the significant mental health issues that will emerge from outing children to families and taking away their right to socially transition.

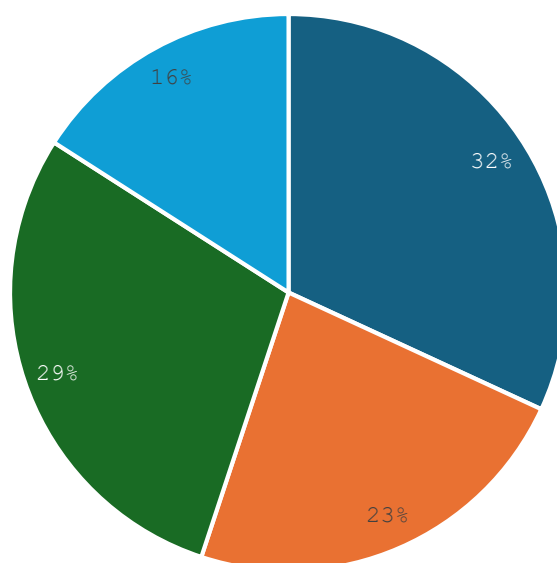
Very little reference to the safety of the trans young people, frequent mention of the comfort and safety of cis children and children of faith. Of course, all children should feel safe at school. Guidance needs to be clarified to note that inappropriate behaviour in bathrooms refers to students teasing or bullying trans students using facilities that align with their identities.

The approach to social transition is far too conservative, social transition is harmless experimentation and fully reversible.

The policy of discussion with parents carries potential harm where parents will react negatively; children and young people should always be asked before telling parents.

Supporting an individual trans child or young person

Do you agree with the advice regarding personalised support



■ Agree ■ The toolkit does not support trans children enough ■ Unsure ■ Disagree

Similar to previous questions, most comments argue for more support and greater autonomy for young people.

the section talks about working with the child but goes against what is previously written about supporting a child that comes out by "working with the parent" when the section also states that's parents may " seek to prevent their child from making any steps towards a transition" which is the best case scenario of a disapproving parent who might want to send their child to conversation therapy or abuse and goes against the will of the child who has a right to withhold that information for their own safety

The Cass review has been widely discredited and is not appropriate to include. There are more accurate and useful documents available to use in place. Many cases it is cited unnecessarily.

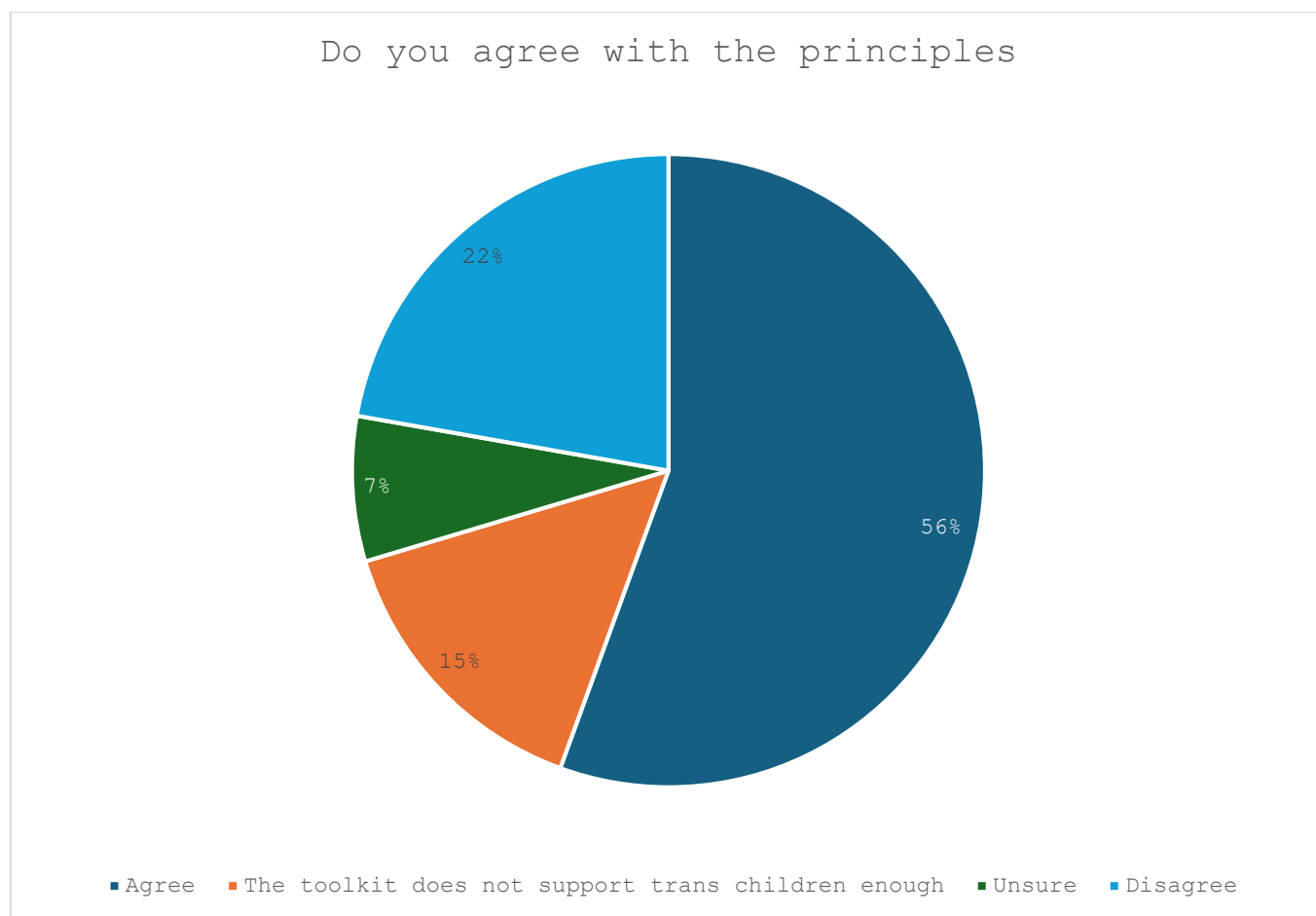
There is no reason for schools not to support social transitioning, and to tell the child's parents has the capacity to put the child at risk of abuse or bullying at home, up to physical violence or conversion therapy. Gillick competence is used for medical decisions, a much lower standard of competence should be needed for social transitioning.

VERY VALUABLE to include "a child or young person with SEND is just as likely to be lesbian, gay, bisexual, trans or gender exploring as any other person" and "All major faiths have LGBT inclusive groups",

Teachers and support staff

There was a total of 56 responses from professionals working in schools

Principles



The negative responses are mixed, with some suggesting the toolkit should not be used at all and some critical of the language used, even suggesting the toolkit is transphobic.

'This ideology does not belong in our schools'

"Schools may wish to consider a watch and wait policy, not placing any pressure on children or young people to live or behave in accordance with their sex registered at birth or to move to gender transition" - schools are not pressuring children to transition. This implies a brainwashing of CYP. This is transphobic.'

Some negative responses appear to be in favour of the toolkit but want more clarity.

'The wording implies that no child can be trans. This is factually untrue. Children as young as 5 have clear understandings of their own gender'

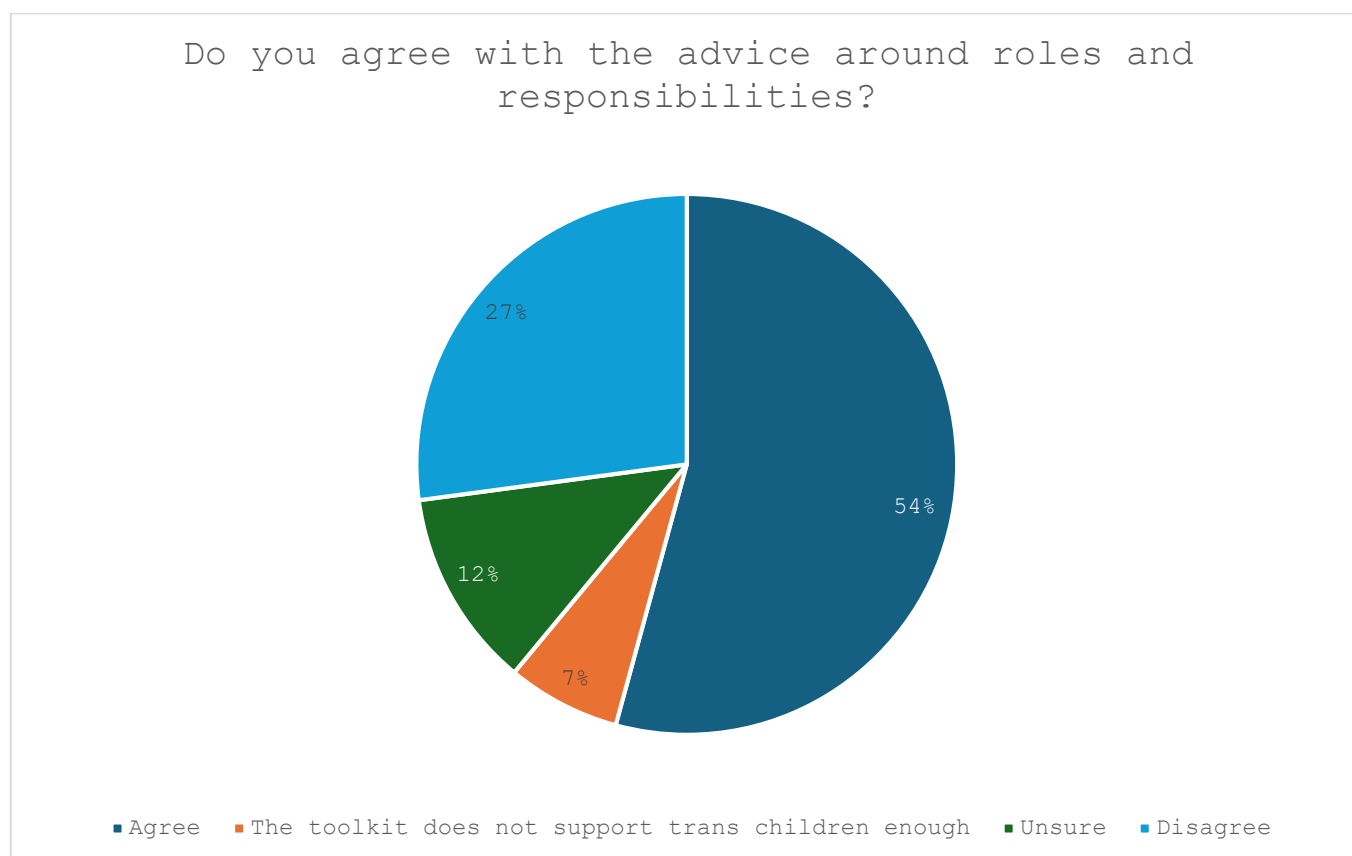
'Trans students should be front and centre'

The positive responses indicate the view that the principles support trans children and reflect an inclusive ethos.

'It's reasonable and fair to treat all students as individuals who should feel safe and supported to explore their gender identity, have their chosen gender identity respected at all times, and for schools and educators to strive to facilitate this as best they can'

'I agree with the underlying principles. The toolkit is about supporting and educating staff and has been made by people who have an honest investment in supporting both LGBT+ young people and CIS and straight young people.'

Roles and Responsibilities



Many agreed the roles of staff were clear.

'I think the most important responsibility highlighted is that schools should ensure that young people feel safe and supported to fulfil their potential.'

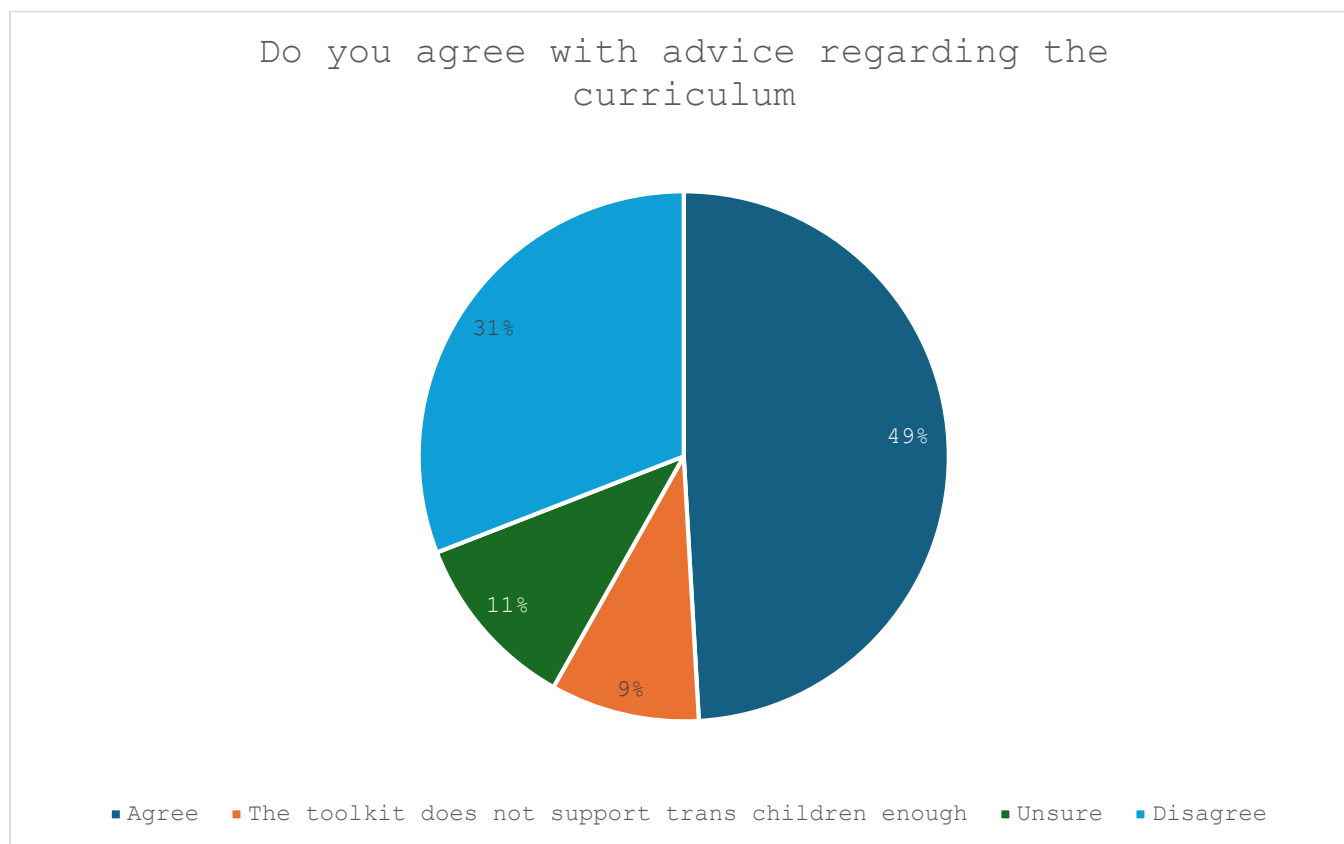
'very clear'

Again, some of the negative responses appeared to be in favour of the toolkit but felt the messaging was not right.

'The aforementioned approach leads to friction between children and educators. Educators are required to inform and work with the parents of a potential trans child. The toolkit downplays the risks faced by the child at home from transphobic parents.'

'clarity over other roles in school needs to be made more explicit.'

Curriculum



The positive responses felt this section was clear and offered appropriate guidance for teachers

'Good, clear support provided. Easy to follow.'

Here again several negative responses appear to be in favour of the toolkit but feel the language is not right.

'Training may be needed to manage these discussions". This is so deeply inappropriate. Can you imagine asking a teacher to facilitate a neutrally-presented discussion about "all viewpoints" on homosexuality (including homophobia) or race (including racism)? Presenting transphobic narratives neutrally, justified by the fact that they are linked to (some) people's religious beliefs, but qualifying that trans people are "allowed" in UK law would absolutely cause trauma to trans CYP in the classroom.'

"the point at which schools consider it appropriate to teach CYP about LGBT" implies there is something inappropriate about LGBTQ+ people.'

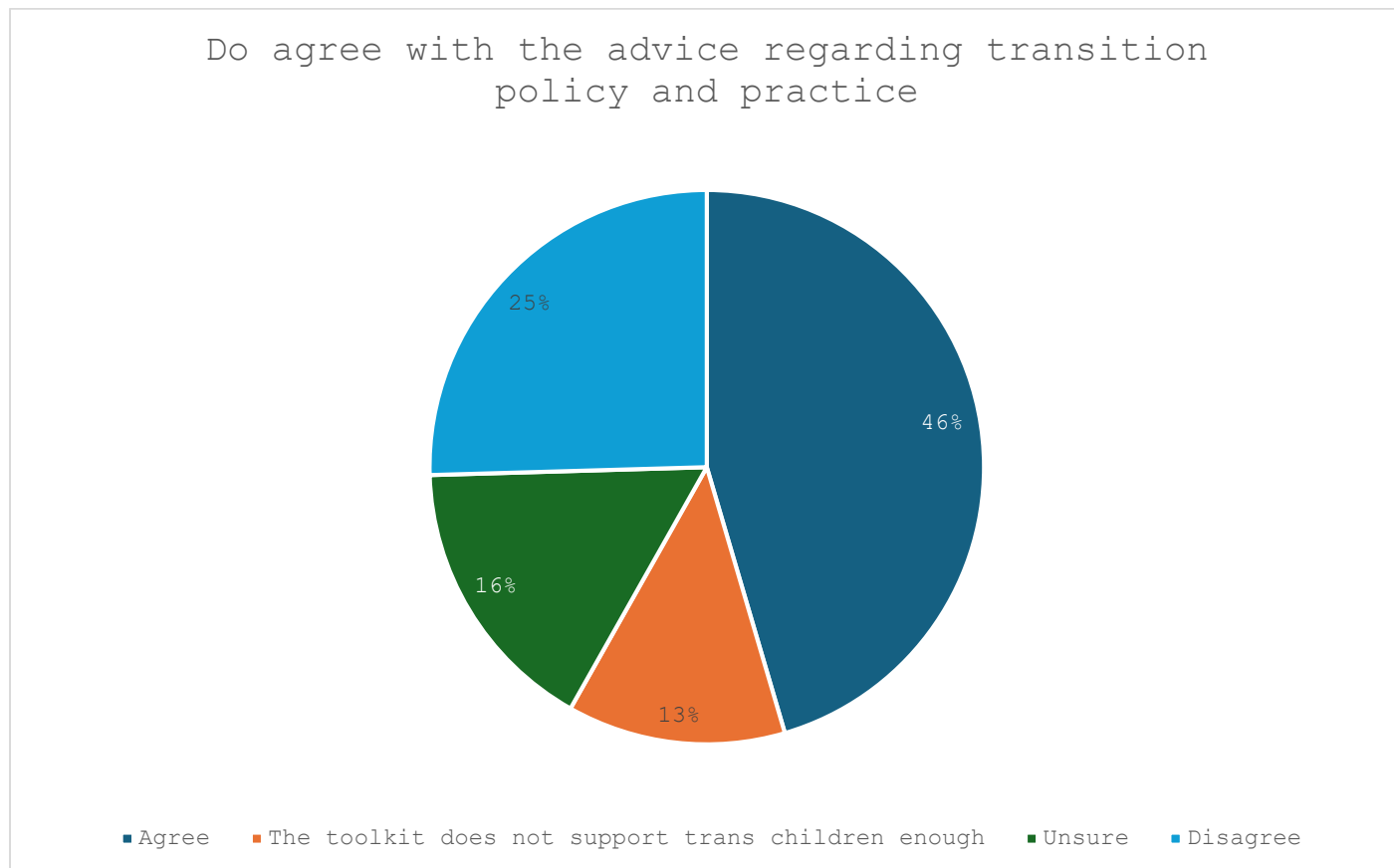
'Some students are trans and there is not enough guidance. Support staff will also be the ones having conversations and doing the pre teaching work mentioned with the trans students and they need the most training.'

Some teachers argued this area should not be part of a school curriculum or that the information was not clear or was biased:

‘Teachers should not be involved in pushing this ideology on our young people’

“all people’s bodies and genitals are different”. This is untrue. Men have genitals; women have genitals. They might be different colours or shapes, but physiology falls into those discrete categories.’

Support for developing policy and practice regarding transition of trans children



Some agreed with this area of the toolkit:

‘I believe this covers very well the most relevant cases and issues that are likely to arise and provides a good groundwork to develop and evaluate policy and best practice.’

Once again, several negative responses appear to support the toolkit but feel the approach and language is incorrect or disagreed that parents/carers should be central to any decision making.

‘Children should be able to explore their identities without the assessments of a group of school staff. The need to tell parents will subject children to abuse at home by parents that are not accepting of their identities.’

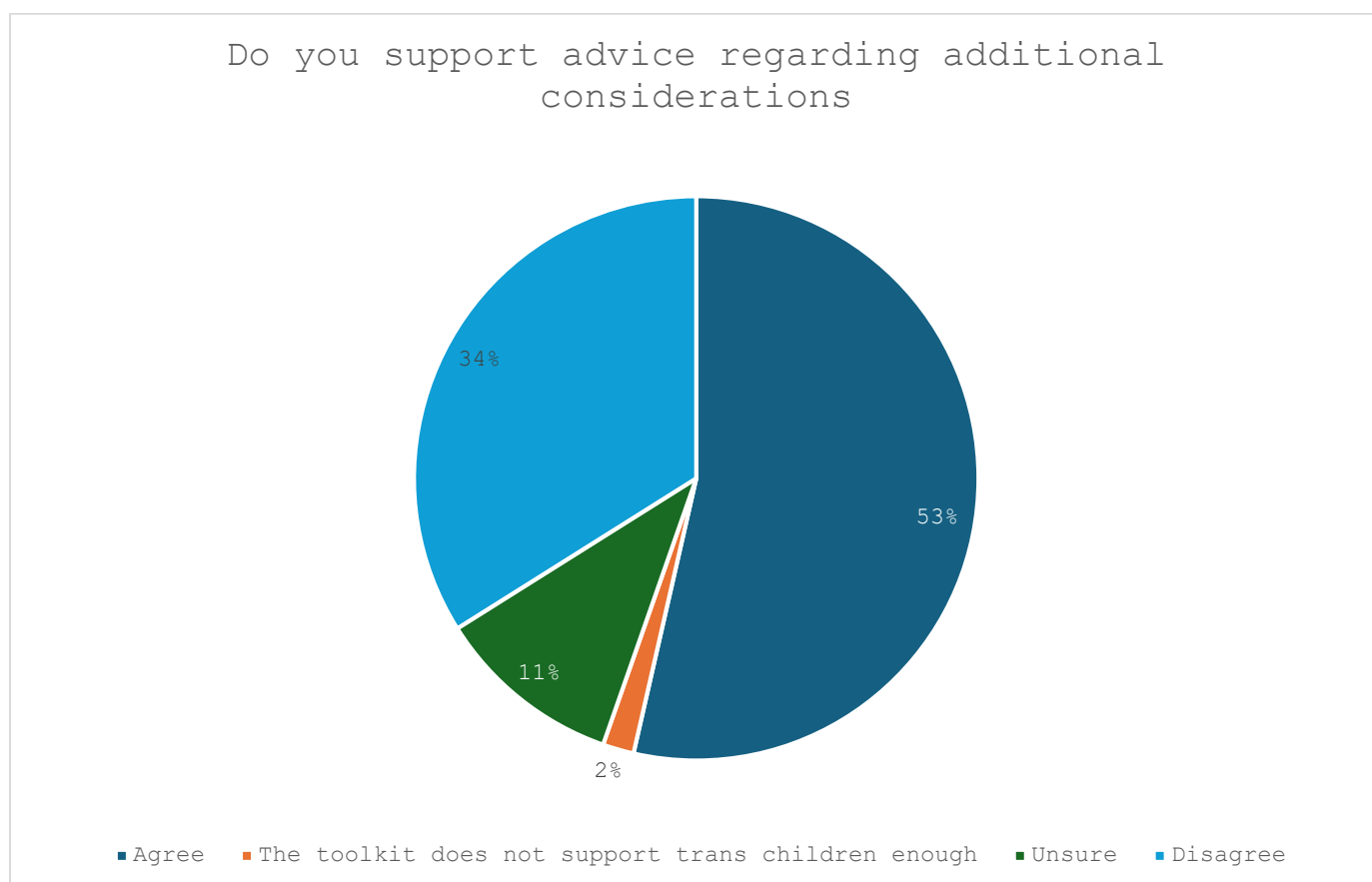
‘The repeated reaffirming of the rights of girls and those with a religion or belief is solidifying the transphobic narrative that the existence of trans CYP violate.’

Several responses indicate that the toolkit leans too heavily into the rights of girls, those with held belief or religious views and the rights of parents.

‘The practice around the use of toilets and changing rooms once again prioritises the concerns of "all other children and young people including girls and those with religious beliefs." over the safety and comfort of the schools trans students.’

There was again concern over the inclusion of references to the Cass Review.

Students with additional considerations



Lots of positive comments in this section.

‘Really good acknowledgement of extra barriers and or vulnerabilities for the trans students with extra layers of need or cultural and faith differences that can impact them.’

‘It’s great to see the consideration of intersecting identities and how this can impact young people’s experiences.’

‘Pleased with the approach to this section and understanding of potential complexities for young people with additional vulnerabilities.’

There were a small number of responses that had concerns around SEN children and ideology and safeguarding ‘extra vulnerabilities’ such as ‘LGBT’. Some raised concerns that vulnerable students were somehow being coerced:

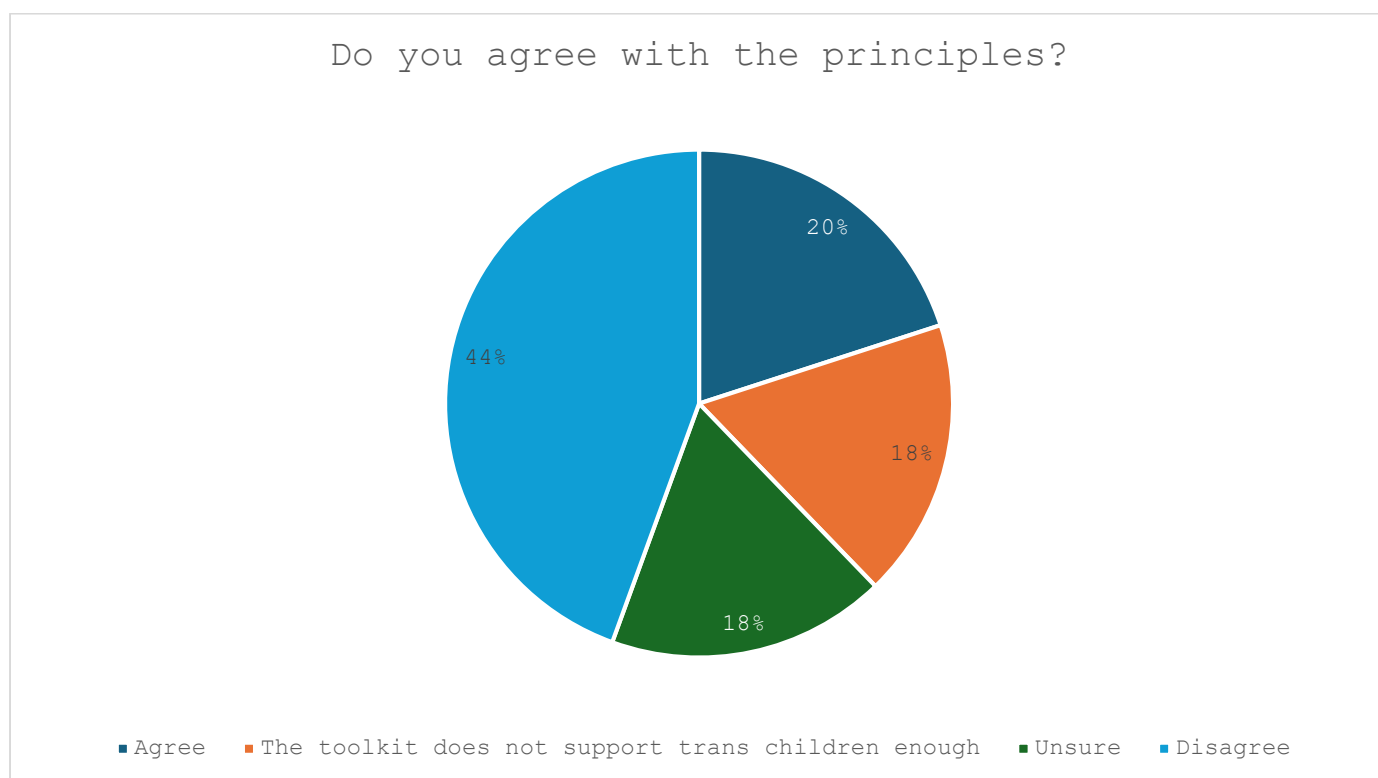
“Vulnerable students are more prone to this indoctrination, as statistics have shown.”

Other individual respondents

There were 90 other people who responded. This included members of the public, residents, other professionals (e.g. NHS doctors) and residents.

In general, this group were much more critical than other groups, with a large number of respondents arguing that the toolkit is “unscientific” and based on contested belief. There was also a large subgroup of people, often labelling themselves as “trans allies”, who felt the toolkit made too much reference to Cass and potentially undermined the support of the current advice. This pattern of response was repeated across the different areas of the consultation.

Principles



There was considerable disagreement with the principles from this group, although many responses were general statements that did not directly link to particular points:

‘The Cass review is harmful and inaccurate and has been deemed unscientific by countless scientific bodies’

‘I believe the underlying principles are flawed and inappropriate. They encourage an excessive clinical approach towards gender affirmation, leading to clinical decisions being made by schools and local authority services. This exceeds the clinical expertise of the practitioners involved.’

‘You talk about "gender identity" which is a fiction that's confusing children into believing they're something that they can't be - i.e., the opposite sex. You talk about homophobia and sexism, but this is exactly what transgender ideology is - it's homophobic and it's sexist. You refer to non-binary, which can't exist - no-one can be neither male nor female. You don't refer to anyone who isn't "trans" and how they will be affected by these guidelines.’

Governing bodies

Governors were a small, but important subset of submissions. We had responses from a number of governing boards and also held a consultation drop in for governors. In total, we had engagement from governors from ten different schools.

In general, governors were supportive of the toolkit:

“we continue to support the principles and guidance of the draft Toolkit”

The main theme regarded the clarity around roles and responsibilities, specifically for governors and school staff:

“We are concerned, given our experience, that any revisions to the Toolkit should clarify the responsibilities of Governors and school staff in this very complex legal space.”

“...our experience as a school suggests that where there is a difference of view between a young person and their parents or carers on what action a school should take, this can become a concern, or be used as a way of attacking the school.”

In conclusion, but would like to see a more explicit approach to the balance of responsibility between Governors, teaching staff and the City Council as employer for community schools.”

Summary of key themes:

Key Themes:

Cass Review – reference to the Cass review is a strong theme that runs right through the survey responses. There are occasional neutral references or the view that the review findings have been misrepresented. However, most references are negative arguing it is too heavily referenced. The responders used language in relation to the Cass review as follows: *biased and transphobic, flawed, dangerous, flawed methodology, unscientific, controversial, discredited by medical organisations, politically driven ideology, Cass review references should be removed from toolkit, biased and damaging.*

Terminology – issues around terminology and language is apparent throughout the responses: *Impossible to challenge stereotypes if using gender neutral terms, confusing for children using gender neutral terms, the word trans not recognised in law – political definition, use of the word trans when describing child – preferred to use ‘gender questioning’, no such thing as a trans child, child should not be referred to as trans- there will be reasons why child not conforming, freedom of speech denied (illegal) if gender critical children not able to express views, use of the word ‘transsexual’ is outdated, ‘trans-gender’ - ideological and socially contested beliefs, gender is a contested concept, trans is street slang, no reference to gender recognition act, the term gender identity is ideological and harmful concept.*

Safeguarding – concerns were raised regarding the involvement of parents and carers, particularly the perceived pressure to inform and involve parents if a child discloses gender questioning. It was feared that children might be at risk or danger if parents were in denial of the issue. Other comments included: *racist and homophobic assumptions made about some parents, not involving parents also referred to as safeguarding issue, ‘social transition is not a neutral act’ a phrase from the Cass review is quoted at various times throughout the survey- possibly a safeguarding issue, ‘colluding’ with the child if agreeing to social transition, social transition places child on a medical pathway, all children need protection, safety of gender critical children,* Concerns were also raised regarding girls’ rights and consent – *girls need a safe place, increased risk of sexual assault on girls, opposing views: toolkit seems to imply trans children a threat to girls -trans children are not a threat to girls, and safety of girls a risk,*

Role of School – The need for training for all staff and governors comes up often. Confusion and need for clarification over what is taught in schools. There seems to be some confusion about the role of a school in supporting a child - views such as: *schools having a clinical overreach* this came up often – some responders seeming to confuse medical transition with social transitioning and that schools should not be making such decisions or be involved: *should be led by professionals not teachers and governors, teachers shouldn’t be acting as doctors, not role of school staff to agree to social transitioning, Toolkit is vague and open to misinterpretation, toolkit not specific...schools may be under the impression they can make clinical decisions*

General Equality Impact Assessment (EIA) Form

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Trans Inclusion Schools Toolkit
Directorate:	Families, Children and Learning
Service:	Education Standards and Achievement
Team:	Equality and Anti-bullying/ Education Advisers
Is this a new or existing activity?	existing
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	There is an EIA for the current version (V4).

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Ashley Seymour-Williams, Senior Adviser, Educational Partnerships
Accountable Manager:	Richard Barker, Head of Education.
Additional stakeholders collaborating or contributing to this assessment:	Helen Emerson, Education Adviser BHCC EDI team Other teams within Education Standards and Achievement.

3. About the activity

Briefly describe the purpose of the activity being assessed:

The purpose of this activity is to produce and publish an updated version of the Trans Inclusion Schools Toolkit ("the Toolkit") in light of recent national publications and research. The toolkit is currently in its fourth version and has been used in schools in Brighton and Hove (and beyond) since 2013 when the first version was published. Version 5 of the Toolkit was issued for consultation in July 2024. The consultation responses have been considered and a further revised version of the Toolkit will be submitted for approval to the cabinet and subsequently for publication.

What are the desired outcomes of the activity?

The Toolkit will continue to be a guidance document used by schools to support trans children and young people across Brighton & Hove, meeting the needs of the key stakeholders whilst sitting within the legal framework of the Equality Act 2010 and other relevant legislation.

This Toolkit has been produced to support staff and governors in Brighton and Hove schools to make informed decisions about how to appropriately promote the welfare of students who are gender exploring

or meet the definition of being transgender. The Toolkit is not intended to be prescriptive or exhaustive. Headteachers and governing bodies must continue to take decisions that they consider are in the best interests of all students and staff at their school. Schools are encouraged to always seek further professional advice if needed, which could be from Brighton & Hove City Council (TransToolkit@brighton-hove.gov.uk).

Use of the Toolkit will contribute to schools' public sector equality duty.

The Toolkit will contribute toward improving holistic educational outcomes for trans children and young people in educational settings across the city. Through the toolkit's advice, schools will provide appropriate, timely, caring and considered support for trans children and young people and their families. This will improve the equity of opportunity for trans children and young people in our schools.

Which key groups of people do you think are likely to be affected by the activity?

The toolkit provides guidance to schools in deciding how to appropriately and inclusively support the education and welfare of trans children and young people. Decisions made by schools when supporting young people have the potential to impact on students and the family/carers of the pupils concerned.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

The toolkit has been in place since 2013 and has had a thorough review and consultation for each version. The current review has been through the following stages:

Review and engagement phase: relevant stakeholders, including children and young people, local service providers and services within the council and schools were invited to contribute. This was conducted through surveys, focus groups, interviews and feedback to a set of review questions for teams to consider and respond to.

Rewrite phase: A new draft utilised feedback from the engagement phase, whilst also reviewing recent changes in law, statute and research. This draft was shared with the legal team, EDI team and other relevant BHCC teams for feedback.

Consultation phase: Open consultation was hosted on the BHCC website 'Your Voice' platform. Further focus groups were held with similar groups to the engagement phase. School staff, governors, focus groups with the parent and carers of trans children and young people, focus groups with trans children and young people, focus group with the Youth Council. Emails advertised and encouraged all stakeholders to complete the online consultation. The responses were comprehensively reviewed before formulating the final draft of the Toolkit

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	YES - Safe and Well at School Survey (SAWSS)
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Disability and inclusive adjustments, coverage under equality act and not	Yes - sawss
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes - sawss
Religion, Belief, Spirituality, Faith, or Atheism	Yes - sawss
Gender Identity and Sex (including non-binary and Intersex people)	Yes - sawss
Gender Reassignment	Yes - sawss
Sexual Orientation	Yes - sawss
Marriage and Civil Partnership	Not applicable
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Not applicable
Armed Forces Personnel, their families, and Veterans	Yes - sawss
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes - sawss
Carers	Yes - sawss
Looked after children, Care Leavers, Care and fostering experienced people	Yes - sawss
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	No
Another relevant group (please specify here and add additional rows as needed)	Na

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The Toolkit will continue to be the subject of periodic review.
There is a specific toolkit email box for question and queries.

6. Impacts

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	Yes
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The toolkit is aimed to support school aged children under 18.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Potentially. The Cass review highlights research studies that suggest “...transgender and gender diverse individuals are three to six times more likely to be autistic than cisgender individuals after controlling for age and educational attainment.” Advice is provided within the toolkit to better support children with SEND.

6.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

There is the possibility that for religious reasons some people would consider the assertion of any child as being transgender as being a contested belief. Gender reassignment is a protected characteristic under the Equality Act as described in the Toolkit. The toolkit considers how to balance the approach to different groups with protected characteristics, and ensure that pupils and students are not the subject of discrimination .

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In the consultation some people expressed a fear that girls might cease to have access to single sex safe spaces. The toolkit considers how to address the needs of different groups with protected characteristics.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Safe and Well and School Survey consistently shows that trans children and young people in our schools feel less safe at school than their cisgender peers. They experience more bullying, feel more sad and don't feel happy as often.

The most recent Joint Strategy Needs Assessment identifies that lesbian, gay, bisexual and/or trans people are at a higher risk of experiencing poor mental health. This includes a higher risk of a range of mental health problems, including depression, suicidal thoughts and self-harm, and alcohol and substance misuse.

The Toolkit will give staff a renewed confidence to appropriately support trans children and young people. This toolkit will equip teachers with the knowledge, skills, and resources to effectively support trans children and young people while navigating the complex intersections of identity and educational responsibilities.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</p> <p>Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.14 Homelessness:

<p>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</p>	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

<p>Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?</p>	NO – the Toolkit provides guidance on supporting transgender and gender questioning pupils and students who may be at higher risk of abuse or violence.
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Engagement activities and feedback from schools using previous versions of the Toolkit suggest there will be a positive impact from the continued use of this guidance, by upholding rights of trans children and young people to access education.</p> <p>Within the Toolkit there is clear guidance on the legal rights and protections for trans children and young people within an educational setting.</p>

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Each trans child or young person will face unique challenges but those with multiple intersections may face more discrimination based on these factors such as being migrants, asylum seekers or refugees, young people of faith or black or racially minoritised young people. The holistic, intersectional approach in the toolkit, addresses not just gender identity, but how it interacts with other aspects of pupils and students' identities and life circumstances. The approach and guidance provided in the Toolkit is flexible enough to support trans children and young people with diverse backgrounds and experiences.

The comprehensive approach of the Toolkit allows teachers nuance when understanding and addressing how multiple minoritised identities intersect with trans identity, creating unique challenges and needs.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

<ul style="list-style-type: none"> Staff training – increased knowledge, awareness and confidence
<ul style="list-style-type: none"> Support for school leaders and governors
<ul style="list-style-type: none"> Continued monitoring of toolkit, national agenda and policy and regular review of the Toolkit

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Toolkit review and monitoring service/ team plan

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X

Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

A paper for cabinet has been prepared. This paper highlights the process for scoping, the review, the rewrite, the consultation and amendments to the fifth version of the toolkit.

To support the council’s aims in creating a city that is inclusive, accessible and fair – a place where everyone can thrive – committee is asked to approve publication of the latest revised version of the Trans Inclusion Schools Toolkit. This resource supports schools and education settings to develop policies and practice that support some of the most vulnerable children and young people in the city.

Trans young people have consistently been identified both locally and nationally as highly vulnerable in terms of health and education outcomes. Brighton & Hove Council have recognised this, and since 2013, has published guidance for schools and education settings to support trans and gender exploring children and young people to access education services successfully.

This guidance and advice has been recognised by many other councils, the NHS, schools and education settings both within and outside the city as providing crucial guidance and support for school leaders, teachers and staff working in education settings. There are many stories of young people who have been successfully supported through Brighton & Hove schools making use of the toolkit’s guidance.

Trans children and young people remain one of the most vulnerable groups in the city (as seen in the SAWSS). Anecdotal and engagement activity shows that the toolkit is helping the health and wellbeing of children and young people in the city.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Ashley Seymour-Williams	14 January 2025 – amendments made on 14-Jan-25
Accountable Manager:	Deb Austin	14 January 2025

Brighton & Hove City Council

Cabinet

Agenda Item 141

Subject: Warm Homes: Social Housing Fund

Date of meeting: 23 January 2025

Report of: Cabinet Member for Housing & New Homes

Contact Officer: Name: Corporate Director for Homes and Adult Social Care

Tel: 01273 293150

Email: miles.davidson@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to seek cabinet's approval to enter into a grant agreement with the Department for Energy Security and Net Zero (DESNZ) pending a successful application to the Warm Homes: Social Housing Fund and, subject to this, award a contract to E.ON Energy Solutions to deliver works outlined in the agreement.
- 1.2 The Warm Homes: Social Housing Fund (previously known as the Social Housing Decarbonisation Fund) provides funding to local authorities, combined authorities, registered providers of social housing, and registered charities that own social housing in England to install energy efficiency upgrades and low-carbon heating measures to homes in England. Administered by the Department for Energy Security and Net Zero (DESNZ) the application window for Wave 3 of this funding closed on 25th November 2024. A bid was submitted on behalf of the council, successful applicants will be informed in early 2025.
- 1.3 The funding will enable the upgrade of up to 151 of our council homes to meet a minimum Energy Performance Certificate (EPC) band C standard, delivering warm, energy-efficient homes, reducing carbon emissions and fuel bills and tackling fuel poverty. This aligns with both the ambitions set out in our housing strategy – 'Homes for Everyone', in particular the priority to 'improve housing quality, safety and sustainability' and our planned investment of circa £30m in sustainability measures in council homes over 5 years, alongside the broader corporate plan outcomes: 'A City to be Proud of' and 'A Fair & Inclusive Council'.

2. Recommendations

- 2.1 That Cabinet delegates authority to the Corporate Director for Homes and Adult Social Care, in consultation with the Cabinet member for Housing and New Homes and the Cabinet member for Net Zero and Environmental Services, to enter into the Grant Agreement with the Department for Energy Security and Net Zero for the Warm Homes; Social Housing Fund Wave 3.
- 2.2 That, subject to Warm Homes: Social Housing grant funding being agreed, Cabinet delegates authority to the Corporate Director for Homes and Adult Social Care, in consultation with the Cabinet member for Housing and New Homes, to award a contract, following 'negotiation without reopening competition to Suppliers', to E.ON Energy Solutions to deliver the works summarised in this report with a value up to £2.4 million from April 2025 to September 2028.

3. Context and background information

- 3.1 The Warm Homes: Social Housing Fund (WH:SHF) Wave 3 opened for applications on 3rd October 2024 and closed at midday on 25 November 2024. This wave builds on previous waves under the Social Housing Decarbonisation Fund, as it was previously known. The project will upgrade up to 151 of our council homes currently below Energy Performance Certificate (EPC) band C up to that standard as a minimum.
- 3.2 The key aims and objectives set out nationally for WH:SHF Wave 3 are:
 - Fuel Poverty: Reduce the number of households in fuel poverty by improving the energy efficiency rating of social homes below EPC band C and reducing energy bills
 - Carbon: Deliver cost effective carbon savings to contribute to carbon budgets, and progress towards the UK's target for Net Zero by 2050 by reducing CO2 emissions from social housing
 - Residents: Improve the comfort, health, and wellbeing of social housing residents by delivering warmer and more energy-efficient homes
 - Green Economy: Support economic resilience and a green recovery in response to the economic impacts of Covid-19, supporting thousands of jobs
 - Develop the Retrofit Sector: Create the conditions for growth in the retrofit supply chain capacity and capabilities, boosting productivity and innovation in the construction sector. Additionally, upskilling social landlords in retrofit to support future improvements to energy efficiency in the social housing sector
- 3.3 Cost caps and funding: The Wave 3 cost cap is £7,500 of grant funding per home. This cap can be averaged across homes in an application. Landlords, as the applicant, are required to provide co-funding of at least 50% of total

eligible costs. There is an additional £7,500 of grant funding available if the Grant Recipient installs low carbon heating measures in homes off the gas grid. This grant requires no co-funding and sits outside of the wider co-funding structure of the application, we have included 4 homes in the project eligible for this additional funding.

- 3.4 The current breakdown of our council homes EPC ratings is set out below. The current estimated average Standard Assessment Procedure (SAP) rating across all tenanted properties is estimated at 74.4, EPC C:

EPC Band	No. Of Council Homes
A	7
B	1,436
C	9,446
D	1,216
E	76
F	22
G	1

- 3.5 The aim to get council homes to a minimum of EPC C aligns with a number of key national and local drivers, including the housing strategy 'Homes for Everyone', specifically the priority to improve housing quality, safety and sustainability, national and local fuel poverty plans and the Council's net zero aspirations. Our approach to managing and investing in our assets, outlined in the current HRA Asset Management Strategy & Energy plan, both due for consultation and review in 2025 identifies the need to improve the energy efficiency of council homes. This funding and subsequent project will assist us on this journey.
- 3.6 Key dates for funding:
- Application window closed Midday on 25th November 2024
 - Successful projects notified in early 2025
 - Project start date April 2025
 - Deadline for all grant funding to be transferred to Grant Recipients and spent 31st March 2028
 - Delivery window ends 30th September 2028

Route to delivery & outline of project

- 3.7 We have worked alongside E.ON Green Funding Solutions to identify a viable project for which to bid for funding. E.ON have significant experience in managing and delivering these types of works and have had success with other landlords in the delivery of schemes in previous rounds of this funding. The work to date has been carried out at no cost to the council with no commitment to proceeding at each stage from application to funding agreement and delivery on behalf of the council.
- 3.8 If the funding bid is successful and authority is delegated to directly award a contract to E.ON, following negotiations as per the guidance related to the

framework set out in paragraph 11.1, they will provide a range of support through project delivery alongside the council, including: finalising project deliverables, resourcing resident engagement alongside the council, surveying identified properties and managing the installation of measures. As the lead, the council will have overarching responsibility for project management and reporting (both internal and external to DESNZ), contract management, resident engagement and delivery assurance; with the additional E.ON resource and knowledge in delivering similar schemes adding greater robustness.

- 3.9 The funding application is based on a programme of work for 151 identified eligible properties for multiple measures, including solar PV and insulation, with a potential total project value of £2.4m. This will be made up of £1.2m WH:SHF funding and £1.2m co-funding from the councils allocated Housing Revenue Account (HRA) capital budgets for energy efficiency and renewable energy improvements over the three years of the project. As part of the application process we were required to consider whether our application was subject to UK Subsidy Control rules. Following the guidance from DESNZ we were able to confirm that as we are a 'Local Authority applying as a single applicant for funding to use on their own social housing stock' we are not subject to subsidy control requirements.
- 3.10 If the funding application is successful, and the recommendations set out above are agreed, then we are able to directly award a contract to E.ON through an existing, compliant, procurement framework (see paragraph 11.1).
- 3.11 The contract with E.ON would be managed by Housing's Sustainability and Energy team with regular contract management meetings to monitor the Key Performance Indicators (KPIs) and feedback from tenants.
- 3.12 The KPIs for the contract will reflect those required in the reporting of the grant funding with the addition of a KPI for social value. The contractual obligation in accordance with Clause 24 of the Framework Agreement is that the appointed contractor will create social value equivalent to at least 10 credits for every £100k of contract value; this being the actual value of the contract between the contractor and the council. An example of how social value can be achieved through the credits is that 50 credits (based on £500k spend) should lead to 1 full time job created for one year.
- 3.13 The KPIs for the grant are:
- KPI 1 - No. of homes identified as suitable for retrofit
 - KPI 2 - No. of homes ready for installations to start
 - KPI 3 - No. of homes with installations started
 - KPI 4 - No. of homes with installations completed
 - KPI 5 - No. of homes completed (all measures have been completed and lodged on Trustmark)

4. Analysis and consideration of alternative options

- 4.1 Improving the energy efficiency of council homes is a key objective and aligns with the corporate plan outcomes: 'A City to be Proud of' and 'A Fair & Inclusive Council'.
- 4.2 Recent government announcements have indicated a requirement that all social housing, where feasibly practicable, will need to meet a minimum EPC C level by 2030. This provides an opportunity to attract additional funding for these works, focuses on some of our less energy efficient homes and builds on our internal resource and expertise to deliver works of this nature by working alongside an experienced partner. The alternative to applying for this funding is to fully fund the costs from HRA capital budgets.

5. Community engagement and consultation

- 5.1 Building on our experience of extensive resident engagement as part of our current solar PV programme and low carbon heating projects, a resident engagement plan will be developed alongside a delivery programme. This will ensure residents are suitably engaged and communicated with around the works, the benefits the works bring and the positive outcomes they can achieve.

6. Financial implications

- 6.1 As set out in paragraph 3.9 of this report, there will be a requirement to match fund £1.2m of the total projected project value. This can be met from within the proposed HRA capital budget for energy efficiency and renewable energy improvements, which has provisional budget allocations of £1.5m for each of the next 3 financial years (2025/26 - 2027/28), subject to formal Full Council approval in February 2025.
- 6.2 Any officer time involved in support of delivery and management of the project will be met from within existing and approved HRA revenue staffing budgets.

Name of finance officer consulted: Mike Bentley Date consulted 03/12/24

7. Legal implications

- 7.1 The Council has the power to enter into the arrangements contemplated by the recommendations under section 1 of the Localism Act 2011. The Council is required to comply with the Public Contracts Regulations 2015 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. Using a Framework, such as the Fusion 21 Decarbonisation Supplier Framework, is a compliant route to market. The Council's Contract Standing Orders (CSOs) will also apply to this procurement exercise and the requirements of CSO 7.5 must be met. On the basis that E.ON provides value for money and the framework terms allow for a direct award, then the Council may award to E.ON as one of the

suppliers on the Fusion Framework Agreement without the need for a further competition.

Name of lawyer consulted: Eleanor Richards Date consulted: 06/12/24

8. Equalities implications

- 8.1 An Equalities Impact Assessment has been completed for similar programmes on our own housing stock, such as the current solar PV programme, this is in the process of being reviewed and actions identified as part of the preparation for engaging with residents and preparing for delivery of works in homes, pending notification of a successful bid.

9. Sustainability implications

- 9.1 The project outlined above will improve the energy efficiency of up to 151 of our council homes, reducing carbon emissions from our housing stock and the city overall. The learnings from this project will also be used to inform future bids for external funding and the wider delivery of energy efficiency improvements on our own housing and private housing in the city.

10. Health and Wellbeing Implications:

- 10.1 Addressing fuel poverty is a key objective with this funding and is reflected locally in a revised Fuel Poverty & Affordable Warmth Plan - presented at the Health & Wellbeing Board in November 2024. The impacts of cold homes on health are well known, the works that will be delivered as part of this project will have a positive impact on making homes more affordable to heat.

Other Implications

11. Procurement implications

- 11.1 If we are successful with a funding application and the recommendations set out above are agreed, we are able to directly award to E.ON through an existing compliant procurement framework. The procurement framework is an agreement in place with a range of providers where we can procure goods and services from a list of pre-approved suppliers with agreed terms and conditions and legal protections already in place. The Fusion 21 Decarbonisation Supplier Framework was awarded on a 60%/40% quality vs. cost basis, and a contract can be entered into via a direct award to the preferred supplier. The grant is not regulated by the Public Contract Regulations 2015 and therefore does not require procurement input.

12. Crime & disorder implications:

- 12.1 None

13. Conclusion

- 13.1 National policy and local plans are promoting that homes achieve a minimum level of EPC C, where practicably feasible to do so. If the grant funding is agreed then up to 151 households will benefit from reduced energy bills, the local economy will expand in relation to the retrofit sector and the funding will assist the council in achieving this for 151 council homes not currently at this standard. It will also reduce CO₂ emissions from social housing and thereby contribute to the UK's target for Net Zero by 2050 and local ambition.

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