

## 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.

<b>Name of activity or proposal being assessed:</b>	<b>Public consultation on School Admission Arrangements 2026-27</b>
<b>Directorate:</b>	Families, Children & Learning
<b>Service:</b>	Education and Skills
<b>Team:</b>	School Organisation
<b>Is this a new or existing activity?</b>	Existing – although with proposed amendments

<b>Are there related EIAs that could help inform this EIA? Yes or No</b> (If Yes, please use this to inform this assessment)	No – although EIAs have been produced in the past for other school organisation matters that have gone through committee/cabinet processes
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## 2. Contributors to the assessment (Name and Job title)

<b>Responsible Lead Officer:</b>	Richard Barker, Head of School Organisation
<b>Accountable Manager:</b>	Jo Lyons, Assistant Director Education and Skills
<b>Additional stakeholders collaborating or contributing to this assessment:</b>	Saul Johnston, School Admissions Manager Carolyn Bristow, Service Manager – Policy and Business Support

## 3. About the activity

Briefly describe the purpose of the activity being assessed

Admission Authorities are required to determine their admission arrangements annually. Where changes are proposed, the admission authority must first publicly consult on those proposed arrangements. The council is proposing to hold a public consultation on the city's school admission arrangements for the academic year 2026/27.

The consultation will run from 6<sup>th</sup> December 2025 until 31<sup>st</sup> January 2025. The council will be asked to formally determine the arrangements in February 2025 as they are required to be set around 18 months ahead of taking effect.

This EIA and action plan will consider the accessibility and impact of the consultation as well as reflecting on the proposed changes to admission arrangements.

A summary of the proposed changes are:

- To consider Published Admission Number (PAN) changes at four schools
- To amend the Secondary school admission priority criteria to introduce a new 'open admission' priority and to make some amendments to the existing criteria around Free School Meal eligible applicants.
- Changes to the catchment area lines between the catchment areas for Longhill School and for the area for Dorothy Stringer and Varndean School
- To increase the number of preferences an applicant can express.

Reasons for these changes are set out in the accompanying Cabinet report but aim to support disadvantaged children in the city and part of the approaches taken to tackle the issue for falling pupil numbers across the city.

The aim of the consultation process is to seek the views of other admission authorities, adjoining neighbouring local authorities, schools' governing bodies, parents of children between the age of 2 and 18 and any other people who are interested in the admission arrangements.

Pupil numbers in the city have been falling and are forecast to continue to fall over the next few years. Too many spare school places in the city will result in some schools not getting enough pupils

What are the desired outcomes of the activity?

To ensure that a thorough, robust and sound public consultation takes place to enable Council Members to make an informed decision in February 2025. The desired outcomes of the changes in school admission arrangements are detailed in the accompanying Cabinet report.

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

Pre-school and school aged children, and their families/carers, across all protected characteristics, could be impacted by the proposed changes, plus schools and their communities in the affected areas.

#### 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 Council undertook a pre-consultation engagement activity to help to inform these proposals. Three illustrative models were presented for comment and the Council outlined objectives including:

- A school system where all pupils get access to a great education
- Improve the education offer for disadvantaged pupils by reducing some schools' barriers to success.
- Use all available options to maintain a broad curriculum and holistic school experience for all pupils.

In addition, the proposals put forward were designed to include:

- Better equality of outcomes – results not driven by economic advantage.
- Deliver a 'comprehensive' offer from our city schools as a more mixed pupil intake creates better outcomes for disadvantaged pupils.
- To deliver change whilst ensuring a genuine alliance of city schools that considers the 'city child' and works in effective partnership.
- Maintaining the geographic spread of secondary schools in the city. Losing a school in the West, North, or East of the city would be a strategic mistake (future growth in population).

4 public meetings were held during the engagement exercise, with hundreds of attendees. Over 2600 people replied to an engagement survey and send views in directly via email.

The responses to the engagement exercise have informed the proposals that the Council are proposing to address the original intentions.

A summary of that feedback is available within the Cabinet report which accompanies this EIA and further details are available on the council's engagement portal Your Voice: [\(49\) Project: Secondary school admission arrangements | Brighton & Hove City Council](#).

We are now seeking to run a public consultation between 6<sup>th</sup> December 2024 and 31<sup>st</sup> January 2025. As part of the consultation there will be further public meetings held and a new survey available on the council's Your Voice platform. Details are provided within the accompanying Cabinet report.

## 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)	NO
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
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)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Those who have English as an additional language	YES
Another relevant group (please specify here and add additional rows as needed)	NO

**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?

Where no was answered this is where it is not relevant to the age of the impacted group we are considering, school aged children and pre-school aged children and their families.

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

School census data, data we hold on children currently attending year 5 of a primary school in the city, pupil forecasting and patterns of parental preference are all key to understanding what the demand may be, and where within the city. It also enables us to consider demographics and how any changes may affect different protected characteristics in our city residents.

We have multiple years worth of school census data to inform our proposals and to consider the demographic make up of children and their families across the city.

We have conducted an engagement exercise which asked equalities questions of respondees – we had over 2600 responses.

Analysis of the engagement exercise reveals important insights about representation. Of the 54% of respondents who answered demographic questions, there is a notable overrepresentation of White British responses at 36.7%, with all Black and Racially Minoritised ethnic communities comparatively significantly under-represented at less than 2% each (in the context of Brighton’s city-wide demographics).

The age profile of respondents skews significantly towards those aged 35-54, who made up 46% of responses, while younger parents under 35 represented only 3.2% of respondents. A significant gender imbalance is evident with 38.6% female versus 11.7% male responses. Participation from disabled community members was low at 9% combined, and particularly concerning was the minimal input from care experienced individuals at just 0.5%.

These participation patterns highlight gaps in representation in voice that informs our decision-making compared to known city demographics. This indicates a need for targeted engagement strategies during the formal consultation period and careful interpretation of feedback to ensure decisions don't inadvertently favour majority voices (who are still key consultees and impacts on the majority still need collecting, analysing and responding to). The council acknowledges these limitations and commits to implementing additional engagement approaches to address these gaps.

The council will continue existing arrangements to monitor data collected about allocations, school life and the experiences of children to understand impacts across all diverse communities with intersectional lived experiences . The following points will be considered during and beyond the consultation period.

These points will also be factored in to the action plan provided towards the end of this document. :

- Consider the intersectionality of children, young people and family needs within the city. Ensure that consultation responses are encouraged from a diverse range of residents and stakeholders and, where needed, seek expert advice and help e.g. from EDI officers and from organisations that support working with experts by lived experience
- Ensure that monitoring of survey responses takes place across the consultation period so additional efforts can be made during the consultation window if further representation is to be enabled from communities within the city
- Conduct further work on identifying and understanding barriers before, during and after the consultation particularly for disabled, intersectionally complex diverse families and children from

culturally diverse, local and international backgrounds. This must be done with lived experience holders (often minoritised with needs under-represented and misunderstood in system design)

- Take learning from this and previous consultation activities to consider a widening of monitoring and tracking activity available to the local authority to monitor any impacts of this policy change – particularly around barriers to inclusivity and attainment, social mobility indicators, community satisfaction, impacts on school choices, and effects on local community networks. There is an importance of this work being done intentionally and from an intersectional/EDI- informed expertise lens

For implementation of the proposed changes, specific attention will be paid to monitoring impacts on minoritised groups using available data to track application patterns and preferences, success rates in securing preferred schools, travel times and accessibility, educational outcomes and progress, family engagement levels and appeals data, feedback on barriers faced by parents, families and pupils across diverse backgrounds and lived experiences.

Transparency and accountability will be strengthened and maintained through:

- regular public updates,
- clear communication about changes made in response to feedback, including the consideration of accessible language, targeted communications and EDI expertise advice
- published monitoring reports, and
- oversight from a community reference group.

This approach will be supported by a continuous improvement mindset, capturing insights to inform future policy development and strengthen community relationships. It will ensure the council:

- maintains active dialogue with communities throughout the process,
- demonstrates how feedback influences decisions,
- continues to be flexible and adapt approaches based on emerging impacts.
- regular reporting on these activities will provide transparency and accountability for our commitment to being a listening council.

These approaches will enable the council to track the effectiveness of both the consultation process and the implemented changes, ensuring we can respond promptly to any adverse impacts identified and demonstrate the tangible benefits of the changes for all communities.

We have previous formal admissions consultations which can inform our thinking and what we may hear back from families and other stakeholders.

We have multiple years of allocation data into primary and secondary schools which can help inform what we are proposing.

We have reviewed local census and demographic data for Brighton produced by Joint Staff Needs Assessment (JSNA) listed in [Census 2021 population groups](#) and [JSNA report on Population and population groups](#).

## 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

<b>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.</b>	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.

What do we know?
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One proposed change will affect parents and children born between 1/09/2021 and 31/08/2022 who are due to start primary school in September 2026 – where they may be seeking entry into Rudyard Kipling Primary School. The proposal is to expand its PAN and therefore it is not considered that there will be any significant negative effects on that cohort as it may increase the chances of gaining a school of preference in that area of the city.

The other proposed changes will impact on the cohort that are due to start secondary school in September 2026. These are children born between 1/09/2014 and 31/08/2015 who are due to start secondary school in September 2026. There are currently 2447 children in this age bracket attending Primary schools locally, and it is estimated 2284 will require a mainstream school place in year 7. There are currently 2560 places available which will reduce to 2440 if the proposed PAN reductions take place. During the public consultation we will be seeking to collect age data from the respondents so we can see continue to monitor the views expressed by different age ranges in the city but also to consider whether there are groups we've not heard from.

During the engagement exercise a slim majority of the 2600 respondees (54%) agreed to answer the standard equalities questions. For the question asking them to state their age, 43% declined to answer the question. Of those that did provide a response the majority of survey respondees were aged between 35 and 54 years of age. Whilst you would expect this to be the case with surveys where the significant stakeholders include parents/carers of school aged children and potentially of school staff, it does raise the question about whether younger parents/carers are engaging in the surveys. Further actions should be taken to ensure the consultation reaches a younger set of survey respondees.

What might the impact be on different ages?

#### Pre-school and Primary Age (0-11):

The changes may disrupt established childcare arrangements and walking groups for some families. Pre-school parents unfamiliar with the school system may find it particularly challenging to understand the implications of the changes. The public consultation timing means some affected families may not yet have children in the school system, potentially limiting their engagement.

#### Secondary School Age (11-16):

The increased number of preferences will give students more options for considering secondary school places, potentially reducing anxiety around the application process. The introduction of new priority criteria could help create more balanced and diverse school communities. However, proposed catchment changes may separate existing friendship groups from primary school, potentially impacting social development and wellbeing. Extended travel times could affect participation in extra-curricular activities and reduce independence, particularly for younger secondary students.

#### Young Parents (Under 35):

The engagement exercise data shows under-representation of younger parents, suggesting their specific needs may not be fully reflected in the proposals. Young parents are more likely to rely on public transport and local support networks, making them particularly vulnerable to catchment area changes. However, the increased opportunity through additional preferences could particularly benefit this group who may have less flexibility to move near preferred schools.

#### Parents Aged 35-54:

This age group forms most consultation respondents and typically has more established support networks and resources to manage changes. They may benefit from having more experience navigating school systems but could face challenges if house purchases or moves were based on existing catchment areas. The proposals' emphasis on reducing barriers for disadvantaged pupils could create more opportunities for families across different socio-economic backgrounds.

#### Older Adults/Grandparents:

Many families rely on grandparents/other relatives for childcare and school drop-offs/pick-ups. Changed catchment areas could impact these arrangements, particularly if travel times increase. However, the



focus on maintaining local school provision across the city could help sustain intergenerational support networks. The proposals' aim to create more sustainable schools could benefit future generations, though immediate changes may disrupt existing family arrangements.

## 6.2 Disability:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Disability</a>, considering our <a href="#">anticipatory duty</a>?</b>	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.

What do we know?

For clarification, Children with Special Educational Needs and Disabilities (SEND) who have an Education, Health & Care Plan would be placed in a secondary school under the SEND code of Practice by the SEN team and normal admission arrangements and PANs would not apply. Therefore our attentions in the impact assessment is on children with disabilities but without an Education, Health and Care Plan and disabled consultation respondees.

We know that parents of children with a disability may have more questions or concerns about their child's school application process. There may also be a need to consider a child's individual circumstances under the 'Exceptional Circumstances' criterion within the admission arrangements. This is for the parent/carer to highlight at the point of application and to provide the necessary supporting documentation.

During the engagement exercise a slim majority of the 2600 respondees (54%) agreed to answer the standard equalities questions. For the question asking them if their day-to-day activities were affected by a health condition or disability 46% declined to answer the question. 7% replied 'Yes a little' and 2% replied 'yes a lot'.

This tells us that there are interested stakeholders who are affected by disability so the consultation process should make efforts to ensure their voice can be heard.

In the October 2024 census figures collected showed a total of 22.8% of pupils are receiving SEN Support or have an EHCP:

- 17.2% of pupils are receiving SEN Support
- 5.6% of pupils have an EHCP

Regarding the proposed changes, we know that families affected by disability will be keen to understand any potential impact on their chances of gaining a school of preference.

What might be the impact on those impacted by disability?

The changes proposed do not offer any disproportionate negative impact on families affected by disability as a discrete group. There is a correlation between poverty and disability so a rise, albeit small, in the percentage of FSM eligible places offered increases the chances of a family affected by disability in gaining a place under that priority.

We know that disabled parents/carers may also find it more difficult to respond to an online survey, application process or to attend in person or online consultation meetings. Parents/carers with children who have a disability may not be able to attend a consultation event in person or online.

Therefore, actions will need to be taken to ensure there are a good range of ways diverse disabled families can engage with the public consultation.

To improve consultation engagement with disabled people there should be an intentional, intersectional, neuroaffirmative, and impactful approach that considered the following points – these will also be reflected upon for the action plan provided towards the end of this assessment.

- A combination of accessible in-person and online participation options. For in-person events, venues will be fully accessible with parking options.
- Where needed and requested in advance accommodation should be made for ensuring sign language interpreters, hearing loops, and other assistive technologies will be available
- Online consultations are compatible with screen readers and other assistive technologies. There will also be email submissions and a telephone line available which will ensure people can engage in ways that suit their needs. All digital materials can be available in accessible formats, if requested although advance notice is helpful.
- Consultation times are flexible, offering both daytime and evening sessions to accommodate different schedules and energy levels.
- Partnership with disability organisations and advocacy groups to help reach more people and ensure consultations address relevant concerns. Having facilitators who understand different disabilities and communication needs helps create an inclusive environment where all participants feel comfortable contributing their views.

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).

For the upcoming public consultation, this is covered in the actions section below.

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

<b>Does your analysis indicate a disproportionate impact relating to ethnicity?</b>	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.

What do we know?

The data available for pre-school pupils indicates an increasing percentage of children from Minoritised Ethnic backgrounds for the city in general. There is no comprehensive race/ethnicity data available for the cohort due to start school in September 2026.

Feedback from the Ethnic Minority Achievement Service (EMAS) from a previous admissions consultation indicated that many parents from ethnic minorities or with English as an additional language found a previous consultation confusing even with assistance. There was a reluctance to participate from some groups as they felt that it didn’t affect them partly due to the uncertainty of the housing situations so children may have to move schools anyway and they trust that whatever school parents get it will be a good school. The difficulty of not being able to attend a local school was however identified as a potential problem.

We know that from the 2023 secondary application round 27.9% of all applications were from ethnically minoritised families and there is no ethnicity information for a further 10.3% of applicants. 29.4% of late

school applications were submitted by ethnically minoritised families and for a further 30% there is no ethnicity information. 79.6% of ethnically minoritised families who applied received their first preference school compared to 83.9% of white British families.

In some allocation years a higher percentage of pupils from ethnic minorities apply late or are directed to a school that was not a preference.

There has been an increased percentage of ethnically minoritised respondents who answered the equalities monitoring question in previous consultations about the council's admission arrangements from 19% in 2021 to 22.6% last year.

During the engagement exercise a slim majority of the 2600 respondees (54%) agreed to answer the standard equalities questions. For those that responded to the question that asked them to describe their ethnic origin, the majority of respondees declared themselves as White: English, Welsh, Scottish, Northern Irish, British.

Other responses, all of which were under 2% (but more than 10 people) of responses include:

- White Irish
- Mixed or multiple ethnic groups
- Mixed Asian and White
- Mixed Black Caribbean and White
- Asian/Asian British Indian
- Asian/Asian British Chinese
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From the January 2024 school census, 31% (9,632) of pupils who supplied their data identified as an ethnicity category other than White British. This is an increase of 163 pupils since January 2023. The three biggest ethnic groups (other than White British) in Brighton and Hove schools were: White - Other 4.9%, Mixed dual background - Other 3.5% and Mixed dual background - White & Asian 3.3%.

We know that the city has a greater proportion of ethnic diversity than is represented in the declared results from the engagement exercise and therefore efforts need to be made to ensure that a diversity of respondees are sought and enabled to participate in the upcoming public consultation.

What might be the impact on those from Black or global majority groups?

The data reveals disparities in school access and engagement for Black and global majority ethnic groups in Brighton & Hove's school system. These families experience lower rates of securing first preference schools (79.6% compared to 83.9% for White British families) and are overrepresented in late applications (29.4% of late applications despite making up 27.9% of total applications). This suggests existing systemic barriers that need careful consideration in any proposed changes to school admissions arrangements.

The engagement exercise highlighted levels of underrepresentation, with each Black and Global Majority communities showing less than 2% response rates compared to 36.7% White British responses. This points to families in the city facing barriers to engaging with the local authority on matters affecting their children and work is needed to ensure understanding and action is taken. This includes taking an intersectional approach around family needs and seeing support and advice from experts by experience and EDI professionals to ensure a wider range of views are heard and captured.

#### 6.4 Religion, Belief, Spirituality, Faith, or Atheism:

<b>Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?</b>	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.

What do we know?

There are only Church of England and Roman Catholic church-aided schools within the city. These schools can prioritise children of faith above other children. A number of these schools do prioritise children of other faiths above children of no faith.

None of the faith schools are proposing a reduction in PAN for September 2026. 23% of first preference primary applications for September 2024 were for church aided schools in the city and 77% expressed a first preference for secular schools. 31% of first preference secondary school applications for September 2024 were for church aided schools in the city and 69% expressed a preference for a secular school.

All schools identified for a reduction in PAN are community schools and this could potentially have a disproportionate impact on pupils with no faith.

Church-aided schools in the city are responsible for their own admission arrangements and the council cannot consult on changes to their PAN or their admission arrangements. The council will need to ensure that there are sufficient secular school places available for all residents who require one within a reasonable distance.

Some parents will seek a secular education for their child whilst others will want their children taught in line with their religious belief. Others will be happy to send their children to a church-aided school despite having no set faith at home.

52.5% responded to the Engagement Exercise and answered the equalities monitoring information, from this:

- 32.4% had no particular religion or belief
- 4.2% were Atheist
- 8.2% were Christian
- 2.9% preferred not to say
- A small percentage identified with other faiths (Buddhist – 0.9%, Jewish – 0.5%, Muslim – 0.5% and Hindu – 0.2%)

What might be the impact on those with or without faith?

The proposed changes could impact secular education access in Brighton & Hove. Since all schools identified for PAN (Published Admission Number) reductions are community schools, this could disproportionately affect families seeking secular education.

A key concern is ensuring sufficient secular school places remain available within reasonable distance for all residents, particularly as faith schools maintain control over their own admission arrangements and PAN.

There are potential impacts on religious equality in education access, as some families specifically seek secular education while others prioritise faith-based schooling aligned with their beliefs. The consultation process will need to be sensitive to these different needs, with events planned in secular buildings where possible, except when directly engaging with affected faith / church-aided school geographic communities.

#### 6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Identity</a> and <a href="#">Sex</a> (including non-binary and intersex people)?	NO
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#### 6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Reassignment</a> ?	NO
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#### 6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to <a href="#">Sexual Orientation</a> ?	NO
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#### 6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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#### 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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#### 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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#### 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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## 6.12 [Carers](#):

<p><b>Does your analysis indicate a disproportionate impact relating to <a href="#">Carers</a> (Especially considering for age, ethnicity, language, and various intersections).</b></p>	<p>NO</p>
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## 6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p><b>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).</b></p> <p><b>Also consider our <a href="#">Corporate Parenting Responsibility</a> in connection to your activity.</b></p>	<p>YES</p>
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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.

What do we know?

Children who are in care or previously in care are given a high priority in our school admission arrangements and are highly likely to receive a school of first preference, assuming their status has been confirmed during the application process.

Brighton & Hove City Council have adopted Children in Care and Care Experienced Young People as a protected characteristic. As Corporate Parent, there is a collective responsibility and demonstrable commitment to ensure that children and young people with care experience are enabled to have the same opportunities as any other child or young person.

We know that Children in Care and Care Experienced Young People and adults who were care experienced are more likely to face discrimination.

41% of 19–21-year-old care leavers are not in education, employment or training, compared to 12% of other young people the same age.

There are 66% with SEND and 35% have an EHCP, compared to 12% of the general population. 50% of children and young people in care have a diagnosable mental health condition

51.6% responded to the Engagement Exercise and answered the equalities monitoring information, from this:

- 49.2% had no care experience
- 0.5% had care experience
- 0.3% were not sure
- 1.7% preferred not to say

What impact might there be on those who are care experienced?

Relevant children seeking a school place will be offered the highest priority for admission. However it may be their parents/carers who find they have barriers to accessing the consultation and / or wider school admission process.

The notably low engagement rate of just 0.5% of respondents having care experience highlights a need for better representation in the consultation process. As Brighton & Hove has adopted Children in Care and Care Experienced Young People as a protected characteristic, there is a particular responsibility to

ensure changes don't create additional barriers – specially in enabling potential applicants from expressing their views on the city's admission arrangements.

#### 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)	NO
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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)?	NO
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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.

What do we know?

The schools proposed as having PAN changes are in different planning areas and serve different communities within in the city. From the January 24 school census: Rudyard Kipling Primary School has 27.2% of pupils within the 10% most deprived areas of Britain and 29.2% of pupils within the 20% most deprived areas of Britain. Longhill High School has 34.9% of pupils within the 10% most deprived areas of Britain and 37.7% of pupils within the 20% most deprived areas of Britain. Dorothy Stringer School has 11.2% of pupils within the 10% most deprived areas of Britain and 16.6% of pupils within the 20% most deprived areas of Britain. Blatchington Mill School has 0.8% of pupils within the 10% most deprived areas of Britain and 7.7% of pupils within the 20% most deprived areas of Britain.

Responses to this consultation need to be considered based on the content not just quantity of replies as some areas in the city due to the nature of the community will provide significantly more replies and in a variety of ways.

In the October 2024 census figures collected showed a total of 26.3% of pupils were in receipt of Free School Meals.

The key equity concerns raised during the engagement process include:

- House prices surrounding popular schools becoming inflated, potentially creating barriers for lower-income families.
- Some socio-economic groups being better able to lobby and provide cohesive community responses that may disproportionately influence decision making.
- Some communities may not be adequately represented in public meetings or consultation responses.



- Families who cannot afford to move close to oversubscribed schools could face reduced school choices.
- The consultation revealed concerns about the creation of “premium” catchment areas that could increase rather than reduce educational inequality.
- Concerns around areas being limited to access to lower-performing schools based on geography and socioeconomic factors.
- Financial implications for families, including transport costs, highlighted as potential barriers.

What might the impact be on those who are impacted by Poverty?

Based on the engagement exercise feedback, families impacted by poverty could face several significant impacts from the proposed school admission changes. Longhill High School serves 34.9% of pupils from these most deprived areas. The changes could affect access to preferred schools, outside of their catchment area.

The engagement exercise revealed that families experiencing socioeconomic disadvantage may have reduced capacity to engage in the consultation process or lobby for their interests compared to more affluent communities. This is compounded by practical concerns such as transportation costs and access to schools outside their immediate neighbourhood. The consultation should ensure meetings take place in a variety of communities to enable a wider range of participants to join.

The proposed changes to FSM-eligible priority criteria could provide some positive impact, potentially increasing chances for disadvantaged children to access their preferred schools. The same applies for the proposed new criteria around open admissions.

We know that transport and travel considerations will be key for all families, but particularly from those from a lower-income household who may be more dependent on public transport options available to them.

#### 6.17 Human Rights:

<b>Will your activity have a disproportionate impact relating to Human Rights?</b>	NO
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#### 6.18 English as an Additional Language:

<b>Does your analysis indicate a disproportionate impact relating to those who have English as an additional language</b>	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.

What do we know?

From the October 2024 school census, 16.2% of Brighton & Hove pupils were exposed to a language other than English in their home.

There were 112 different languages other than English (including British Sign Language), recorded in the January 2024 School Census. The three most widely recorded languages, other than English, were: Arabic - 915 pupils, Polish - 409 pupils and Bengali - 273 pupils.

The percentage of pupils with English as an additional language from the October 2024 school census varies across areas in the city from 20.4% in Hove Park and Blatchington Mill School catchment area to 11.1% in the Patcham Catchment area. Within the existing Longhill catchment area 13.9% of pupils speak a language other than English and for the Dorothy Stringer and Varndean catchment area 16.4% of pupils speak a language other than English.

Families with pupils who have English as an additional language are proportionally more likely to apply late which significantly reduces their chance of being offered a place at an oversubscribed school. We understand some of the barriers or different considerations these diverse pupils may face that contribute to late applications. The higher number of families with English as an additional language applying late could be contributed to a number of factors such as these families moving into the city outside the cut off dates for the main admission rounds. This could be due to these families are not being aware of when to apply for school places as they are less likely to understand the promotional information distributed for parents. Families may not comprehend the implication of the proposals or which year they take effect and be able to relate this to their own circumstances.

What impact might there be?

Families where English is an Additional Language are more likely to face barriers to accessing and engaging with consultations and this is heightened when there may be an intersectionality of need within the family. Efforts need to be made within the consultation process to ensure all families are well supported to engage as they wish to in our consultation.

#### 6.19 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

We need to ensure that children and young people accessing school places are not discriminated against and have the opportunity to access inclusive and high-quality school provision. We need to ensure their families can engage well with the public consultation so that a wider range of voices and experiences are heard and captured.

Reducing the number of surplus school places is necessary to safeguard the whole family of schools in the city and to protect schools from financial difficulties as pupil numbers reduce. Without a reduction in school places there is the real possibility that some schools become unable to operate in a financially efficient way with implications for the quality of education provided and the council's own budget.

The proposed changes to admission arrangements are intended to provide greater opportunities for a greater number of children in the city to have opportunities to attend a school that meets their family needs. We recognise that for some families, choosing a school outside of their communities/local area may not be a viable choice for their lives.

The consultation process must be as accessible as possible for all residents to respond to and that events are held at a variety of times and in locations which allow interested residents to participate and the process of receiving responses is also available to all. It must also target outreach to minoritised and groups that face additional barriers in addition to reaching all impacted residents.

## 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)

- Ensure the formal public consultation is open, accessible and easy for a wide range of residents and stakeholders to engage and share their views. Considerations are also made throughout this assessment which will inform the approach.
  - Ensure childcare providers and nurseries in the city are communicated with very early in the consultation timeline asking them to share with their parents, to enable engagement with younger parents and parents of younger children
  - Liaise with support services such as Family Hubs to continue encouraging participation from younger parents. Greater use of social media platforms and online promotion to reach younger parents in conjunction with traditional methods of promotion. Consideration of timing of any public consultation events so parents with young families can attend.
  - Consultation documentation should be made available in other accessible formats and languages when requested. Parents/carers who are unable to attend a public meeting will be able to access information online or over the telephone or attend a virtual meeting.
  - If consultation events are held online relevant information should be available to be viewed after the event. Timing of events should also be accessible for parents with working and other caring schedules or non-heteronormative commitments.
  - The council will also liaise with PaCC and Amaze. There needs to be sufficient school places within a reasonable distance of families including those families who have someone with a disability living with them.
  - Explore further other methods of engagement with Black and Global Majority, migrant, diverse and multicultural and non-visibly disabled parents, families, and communities to further increase responses to the consultation. Provide reasonable adjustments as needed and requested whenever possible. Continue Including the use of the EMAS service to reach out to communities to communicate the proposals in the consultation and the potential impact on their community. Highlight that there is a translation function on the council's website and engagement portal so that consultation information can be viewed in different languages. Hard copy consultation materials to be made available in different languages and accessible formats as required if requests are made.
  - Consultation events will take place in secular and LGBTQIA+-safe and welcoming buildings wherever possible except where there is a faith / church-aided school community directly affected by proposals.

- Brighton & Hove City Council have adopted Children in Care and Care Experienced as a protected characteristic the consultation will need to be made accessible to care experienced residents.
- Regarding consideration of potential advantage to families who are in the financial position to move close to oversubscribed schools in order to increase chance of obtaining a place, encourage communities in all areas of the city to engage in the consultation process and provide alternative methods for them to respond. Take consideration of the impact of any change in PAN may have on a school in relation to the composition of pupil cohorts and their families to promote a comprehensive education offer.
- Important to ensure that there are still surplus places in each planning area so late applicants and pupils moving mid-year can be offered a place at a local school. Greater emphasis needs to be made in future to reach these families and make them aware of the school admissions applications process. If this group are unaware of the school admissions timescale it is also likely that they would be less aware of the consultation process. Additional steps should be taken to engage these families with this consultation. Advice and support shall need to be sought from the EMAS team and others with links to various communities where there are a number of families with English as an additional language. For public meetings with a focus on a particular community, explore with individual schools the languages spoken and mitigations/steps normally taken within that community to reduce barriers.

2. Use the consultation to collect and reflect further on a greater range of data, including equalities monitoring, relating to any potential implications of the proposal being implemented (as opposed to the focus on the consultation itself as above). Considerations are also made throughout this assessment which will inform the approach.
- Review responses to the consultation as they are coming in, to monitor any data gaps and take necessary action. E.g. if Black and Global Majority communities representation continues to be low, review existing approaches and take additional and intentional activity. Especially important to consider community members with intersectional needs.
  - Through the establishment of a community reflection group looking at admission arrangements in the longer term, consider the ongoing data gaps and barriers – creating a multi-agency plan to address these. This could assist with gathering more detail from different protected characteristic groups to understand daily routines, childcare arrangements, and support networks. This will provide practical insights into how future proposed changes could affect family life.

### 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.

These identified actions will both be reflected upon in the next EIA related to these proposals and where relevant taken into service business plans to ensure oversight continues beyond the span of this consultation process and subsequent reports to Cabinet/Full Council.

## 8. Outcome of your assessment

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

<b>Stop or pause</b> the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
<b>Adapt or change</b> the activity to eliminate or mitigate disproportionate impacts and/or bias.	

<b>Proceed</b> with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
<b>Proceed with caution</b> – 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.	<b>X</b>

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

It is not unusual for a Local Authority area to amend and change city-wide admission arrangements and / or changes to catchment areas as demographics and circumstances of a local area changes. It is important that the council are sighted on and take consideration of the implications of those proposed changes and the EIA plus other implications sections of the cabinet report will assist them to do so. We do not have full and comprehensive information at this stage of the extent of this impact and situations of affected families city-wide. Our consultation should draw out more information to help us make decisions appropriately. The report details mitigations that can be made to better support families in the city accessing the consultation to understand that they may have a negative or positive impact as a result of any changes made. Therefore, it is considered, on balance, right to proceed but caution must be taken to ensure impacts continue to be known, identified, understood and where possible, mitigated against.

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

Consider the equalities impacts on different protected characteristics groups and impacts identified, ensuring mitigations and reduction in negative and disproportionate impact as well as targeted outreach and nuanced consultation, ensuring intersectional and wider non-normative considerations and accessibility, communications and diverse requirements of all those impacted. Specifically:

- Ensure that the public consultation is targeted, widely communicated, open, fair and accessible – with officers and partners using many available and newly identified routes to promote engagement from a wide range of diverse stakeholders/ families/ residents affected by the proposed changes, especially those in socio-economically deprived, disabled, Black and Global Majority, and Migrant communities.
- Ensure that the consultation further helps the collection, understanding and analysis of information around any potential impacts of the proposals and of voice and representation based on richer equalities monitoring data – negative and positive, so that inequity and under-representation of voice, access and opportunity can be addressed and improved upon.

## 9. Publication

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

This will be published as part of the Cabinet paper for 5<sup>th</sup> December 2024

## 10. Directorate and Service Approval

<b>Signatory:</b>	<b>Name and Job Title:</b>	<b>Date:</b> DD-MMM-YY
<b>Responsible Lead Officer:</b>	Richard Barker, Head of School Organisation	25-Nov-24



<b>Accountable Manager:</b>	Deb Austin, Corporate Director – Families, Children, and Learning	26 – Nov - 24
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**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

**EIA Reference number assigned:** [FCL108-26-Nov-24-EIA-School-Admission-Arrangements-Consultation](#)

For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

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.

<b>Signatory:</b>	<b>Name:</b>	<b>Date: DD-MMM-YY</b>
<b>EDI Business Partner:</b>	Not in post	N/A
<b>EDI Manager:</b>	Sabah Holmes	26-Nov-24
<b>Head of Communities, Equality, and Third Sector (CETS) Service:</b> <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>	Emma McDermott (reviewing)	

**Notes and recommendations from EDI Business Partner reviewing this assessment:**

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

Approved based on a robust and nuanced consultation being conducted with internal expertise informing targeted outreach, and monitoring and transparency of committed actions being carried out. Head of CETS is reviewing but had advised we can proceed based on the current assessment pre-fuller public consultation, ensuring we effect learning and improve our planning and approach in the future, making EIAs a more intentional and systematic process.

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

