

## 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 the Equality, Diversity, and Inclusion (EDI) team by emailing [Equalities@Brighton-Hove.gov.uk](mailto:Equalities@Brighton-Hove.gov.uk). If your request is urgent, please mention this in the subject line of your email so we can support as required.

### 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 the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- 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>Determining school admission arrangements for September 2026/27</b>
<b>Directorate:</b>	Families, Children and Wellbeing
<b>Service:</b>	Education and Learning
<b>Team:</b>	School Admissions
<b>Is this a new or existing activity?</b>	New – although partly a repeat of what has happened in previous years – we always undertake an annual consultation into our school admission arrangements
<b>Are there related EIAs that could help inform this EIA? Yes or No (If</b>	Yes –previous years and December 2024 Cabinet decision to commence a public consultation

Yes, please use this to inform this assessment)

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

<b>Responsible Lead Officer:</b>	Richard Barker – Head of Education
<b>Accountable Manager:</b>	Georgina Clarke-Green - Director of Education and Learning
<b>Additional stakeholders collaborating or contributing to this assessment:</b>	Carolyn Bristow – Service Manager for Policy and Business Support

## 3. About the activity

Briefly describe the purpose of the activity being assessed:

The determination of admission arrangements for community schools in Brighton and Hove to take effect from September 2026.

Following a consultation exercise the Council must determine its arrangements for community primary and secondary schools to establish the process by which school places are allocated.

The Council has proposed to make some changes to the existing arrangements, principally introducing a new open admission criteria for secondary schools, the reduction in Published Admission number (PAN) of 3 secondary schools, amending the boundary for one catchment area, and an increase in the number of preferences parents can submit when applying for primary or secondary school places from three to four.

What are the desired outcomes of the activity?

The Council must determine its arrangements by 28 February 2025 and the arrangements need to comply with the requirements of the School Admission Code which outlines that they must be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation.

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

Families with children due to start school or move to secondary school in September 2026 and the community schools who receive them. There are currently 2480 pupils in Year 5 in Brighton and Hove primary schools. The Council's forecast of demand for secondary school places calculates 2284 places will be required.

There is a need to consider groups with protected characteristics and stakeholders whose own work is impacted by the process of allocating school places, such as public transport providers. Currently 26.5% of pupils in the city's primary schools are eligible for Free School Meals. This is equivalent to 657 pupils in Year 5 if FSM eligibility is evenly distributed across school cohorts.

17.2% of the primary school population are at SEN support and this is equivalent to 427 pupils in Year 5 if SEN support is evenly distributed across school cohorts.

In the January 2024 census (equivalent data for 2025 is not yet available) 286 pupils across the city were eligible for FSM, had SEN, were EAL and not white British. Of the 7511 FSM eligible pupils in the city 2046 also had SEN and 307 were FSM, had SEN and were EAL.

In January 2024 34 Year 4 pupils were recorded in all 4 groups, the highest year group in that year's census.

In the January 2025 census, 290 pupils are reported as being Young Carers which has risen from 257 in 2024. There are 36 pupils in Year 5 who would be affected by the proposed changes to secondary school admission arrangements. Approximately 59% of Young Carers do not have any SEND needs recorded, of those that do the biggest primary need is Social Emotional Mental Health and then Autistic Spectrum Disorder.

In the city 32.2% of pupils are recorded as being from an ethnic group other than White British (or refused or not known). The percentage of pupils with English as an Additional Language (EAL) is 16.4%.

The focus of this EIA is on the potential application of the changes to secondary school admission arrangements. Whilst other proposals were included in the consultation these do not hold a material bearing on the process, for example the determination of timelines of the process and the proposal to increase the PAN of Rudyard Kipling Primary School.

#### 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 an engagement exercise in autumn 2024 on possible models of secondary school catchment areas, details of which can be found in the Cabinet [report](#) seeking permission to start a consultation and the Your Voice [platform](#) that hosted the engagement exercise.

The Council then undertook a formal consultation as part of the statutory process of setting admission arrangements, details of which can be found [here](#). Further details of the combination of meetings, and consultation submissions can be found in the accompanying report. Specific activities were undertaken by partners to seek to obtain a broad range of views including working with the Parent and Carer Council as well as the Trust for Developing Communities.

The consultation hosted on the Council's YourVoice portal was open access, did not requiring pre-registration and remained available throughout the length of the consultation. Over 3800 responses were received this way. 63% of consultees did not want to respond to the equalities questions. Of those that did 977 described their gender as female and 322 as male. 1298 of 1375 replies stated the gender they identify with is the same as their sex registered at birth. 10 stated no and the majority did not give an answer. 1017 consultees stated that their sexual orientation was best described as heterosexual/straight, 195 preferred not to say, 68 were described as Bisexual and 36 lesbian/gay woman.

22.2% of consultees stated that they had no particular religion or belief, 5.4% stated they were Christian, 2.9% were atheist and 64.2% did not answer the question.

23.2% of consultees stated that they were married, 14.8% stated that they had never married or registered in a civil partnership. 64.3% did not offer an answer.

55 consultees stated that they preferred not to say if they have been looked after by a Local Authority, 11 stated that they had been. 65% of consultees did not answer the question.

In total 15 consultees stated that they had served in either regular or reserve armed forces, 38 preferred not to say. 33.7 % of consultees preferred not to say and 64.9% gave no answer.

The Council routinely consults on admission arrangements and has therefore a significant amount of corporate memory and understanding as to the insights this provides.

## 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)

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

**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?

The Council is restricted to the information which can be gathered in a common application form when parents apply for a school place. As a result there is a reliance on using contextual information gathered from termly school census regarding the pupils attending each school that can then be used to inform decisions about secondary school places. This will be at a primary school level but as the city does not operate feeder primary schools to its secondary schools no automatic application of the data can be made. The current secondary data will give the context of each school but current cohort data may not be representative after changes have been made to admission arrangements for 2025 and for the proposed changes for 2026.

No equivalent data source is available for those pupils whose application will be to start school in Reception in September 2026.

Additional insight may come from the process of parent’s applying under criteria 2 (exceptional and compelling reasons) or appealing to an independent panel following allocation of school places in March (secondary) and April (primary) each year.

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

The Council is required to provide some limited information to the DfE on the admission process and to the Office of the Schools Adjudicator on a yearly basis. In addition, the Council will monitor and review the termly census data that provides context to the cohorts attending schools in the city. This process can inform how the admission arrangements for September 2027 may be proposed and determined in an activity that cannot start before 1 October 2025.

## 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):**

- [Population and population groups](#)
      - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
    - [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: people who may be housebound, 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.

The admission arrangements will apply to those due to start primary and secondary school in September 2026 so those born before 31 August 2022 and between 1 September 2015 – 31 August 2026. The most significant impact of the proposed changes in admission arrangements will be for those children, seeking a place in a community secondary school, who live in a catchment area and who do not have an older sibling attending the catchment school and are not eligible for Free School Meals (FSM). Their priority for a place will be lower than in previous years should the proposed arrangements be determined.

Those children who are due to start secondary school who are entitled to FSM or live in a catchment area served by one school will receive a higher priority for a school place than in previous years.

We do not hold data on the number of younger siblings due to start school in September 2026 or the number of single children or eldest siblings due to the start school that year.

We have 2480 pupils in Year 5 who are due to start school in September 2026. Not all of these pupils will require a secondary school in Brighton and Hove and the Council currently forecasts the number of places required to be 2284 places.



Of the 1403 responses to the question in the consultation, most identified as being in the age range 35-44 (17.5%), 12.8% were in the 45-54 age range. There was one response from someone aged 0-15 and 5 from those aged 16-24.

## 6.2 Disability:

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

Pupils whose special educational needs and disabilities (SEND) needs qualify them for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon. 17.2% of the school population in January 2025 were SEN support, taken consistently across Year groups would be 427 pupils.

We know that in the current year 5, as at a snapshot in October 2024, there were 220 children who were eligible for FSM **and** on the SEN Support register – this is 8.9% of that year group. So far, data indicates that percentage drops as the children get younger.

Therefore some SEN children will be able to be prioritised for admission to school via their FSM status.

Some examples of schools where this is over 20% - City Academy Whitehawk, Coombe Road, Queens Park, Moulsecoomb, Rudyard Kipling, Bevendean.

Some examples of schools where this is under 5% - Balfour, Downs Junior, Stanford Junior,

Schools that have the highest proportion of SEN Support include Moulsecoomb, Rudyard Kipling, Mile Oak, Coldean, Coombe Road, Bevendean, Fairlight, Carlton Hill, Queens Park and City Academy Whitehawk

Of the affected secondary schools the current percentage of pupils on SEN support is as follows:

Blatchington Mill School - 13.9

Brighton Aldridge Community Academy\*- 29.8

Cardinal Newman Catholic School - 16.2

Dorothy Stringer School - 14.0

Hove Park School\* - 21.4

King's School - 18.3

Longhill High School\* - 25.0

Patcham High School - 23.3

Portslade Aldridge Community Academy - 18.4

Varndean School - 25

Mainstream community schools are expected to meet the needs of all pupils without an EHCP (as well as many that do) and are required to make reasonable adjustments in line with equality duties.

Where these proposals may impact on pupils with disabilities is where mitigations that are in place to minimise the negative impacts of managing within a community school are affected. For example, being able to be placed with a friendship group or trusted and recognised adults. Or where journeys to secondary school are longer and/or undertaken using public transport.

Where these proposals may impact on parents with disabilities is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life.

These factors are likely to have a negative impact when a child's allocation of a school place is either outside of the catchment area or not one of the family's preferred schools. The risk of this occurring will be increased when a child's priority for a school place is affected by changes to the admission arrangements. In the case of these proposals this may affect children living in a catchment area where places allocated to those with a higher priority mean insufficient places for all children living in the catchment area or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school.

Families have identified in the engagement exercise that without an EHCP children may be more likely to not receive a place at a catchment area school and those with disabilities will be adversely affected.

The engagement exercise showed that many consultees did not want to see changes being made to the admission arrangements in relation to specific changes and collectively because of the potential impact of generating more uncertainty in the school application process, the risk of being placed away from support networks and friendship groups. Thereby creating additional logistical issues that would place additional strains on family life.

Parents with disabilities identified that they may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly. This includes ensuring their child's regular attendance at school. Whilst the home to school transport policy can take account of a parent's ability to accompany their child or make their own arrangements we do not hold data specifically on those whose entitlement to transport was based solely on the parent's disabilities.

A child's mental health was an often used example of a negative impact that may follow the implementation of these proposals.

The Parent and Carer Council's submission stated parents found the proposals difficult to understand, particularly the 20% school place allocation and the increase in preferences from three to four. They felt the criteria for Criteria 2 admissions are unclear and may exclude many SEND children, especially those without an EHCP. Transport concerns were a significant theme, with worries about the impact of long daily journeys on students, potentially leading to 'child commuter burn out'. The reduction in available school places at certain schools could increase competition and make it harder for children with SEND to access appropriate placements. There are barriers for children with SEND in terms of long-distance travel and unclear placement priorities under the 20% allocation system. Parents fear that separating autistic children from stable friendship groups could negatively impact their emotional regulation and mental health. Parents described exhaustion from constantly fighting for SEND support and felt excluded from meaningful participation in the consultation process. The proposals risk breaking up SEND support networks, making it harder for children to access peer-led emotional and social support. Parents lack confidence in the decision-making process and feel that SEND needs were not properly assessed before the proposals were developed. Parents need at least 18 months' notice to prepare their child for school transitions, but the current system provides certainty only six months before. Parents shared recommendations such as ensuring every child has a priority placement, modifying the tie-break system, improving certainty for families, reassessing school placements based on location needs, clarifying Criteria 2 admissions, increasing transparency on the 20% allocation process, and improving consultation and co-production.

Additionally, consultees to the consultation outlined concerns that the proposals could overwhelm services with requests for children to be assessed for potential SEN such as Autism Spectrum Condition (ASC) and Attention Deficit Hyperactivity Disorder (ADHD) In terms of the proposed changes in catchment areas, the following data is available from the October 2024 school census.

Current Catchment Areas		Proposed catchment areas	
Dorothy Stringer	Longhill	Dorothy Stringer	Longhill



	Varndean		Varndean	
EHCPs	47 – 6.71%	26 – 7.95%	53 – 7.24%	20 – 6.56%
SEN Support	117 – 16.71%	74 – 22.63%	126 – 17.45%	65 – 21.31%

This shows us that under the proposed arrangements a greater number of children with identified SEN in the current school system (data taken from current year 5 in October 2024) will have the opportunity to be in a dual school catchment area.

Approximately 59% of Young Carers do not have SEN needs, yet 5% have an EHCP and 36% are recorded as being at SEN Support.

27.9% of the consultees to the consultation stated that their day to day activities were not limited because of health problems or disability. 5.3% stated they were, a little and 1.5% stated yes, a lot.

560 responses answered if any of a list of conditions or illnesses reduced their ability to carry out day to day activities. The highest ranked responses were for mental health condition (94), long standing illness (87) and physical impairment (84). 252 replies stated that they preferred not to say.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, 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 EHCP process identifies when a child's SEND requires additional support determined within the content of a statutory document.

Criteria 2 of the admission arrangements allows for priority to be applied where there is supporting evidence to indicate that a child must attend a school because of compelling or exceptional reasons.

After the allocation of a school place, the appeal process, overseen by an independent panel, can examine the reasons as to why a child should be considered for a place at an alternative school and this can be agreed outside of the published arrangements.

The Council has responsibility to ensure pupils receive travel assistance when their needs determine it, in line with statutory guidance and the Council's own home to school transport policy.

All schools are expected to be accessible to all pupils, including those with SEND in line with duties under the Equality Act.

Outside of criteria 2 (which allows the consideration of individual circumstances) the School Admission Code does not allow for consideration to be taken of friendship groups, pupil or parent needs or family logistics in the school admission process.

As per the current arrangements, it is possible that a child with additional needs does not gain a place at a school of preference / at a catchment area school. As above, all community schools in the city are able to support a range of child's needs and so if children do have to attend a school which is not the school of parental preference, they will receive the necessary support.

The declarations made by consultees to the consultation indicated that 6.8% stated that they had a disability.

The Parent and Carer Council's submission identified possible considerations for alternatives as outlined above such as ensuring every child has a priority placement, modifying the tie-break system, improving certainty for families, reassessing school placements based on location needs, clarifying Criteria 2

admissions, increasing transparency on the 20% allocation process, and improving consultation and co-production.

### 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.

Appendix 11 provides a detailed summary of the consultees to the consultation, including where they've indicated their ethnicity.

The common application form does not ask any questions on a child's ethnicity, race or ethnic heritage. The school census in January 2024 (we await data for 2025) highlighted that 31.8% of the primary phase were categorised using DfE terminology as BAME. In secondary schools the percentage was 30.4%.

The primary schools with the highest levels of BAME pupils were: St Mary Magdalen's, St Paul's, Queen's Park, St John the Baptist and West Blatchington. The lowest percentage were at Mile Oak, St Nicolas, Rudyard Kipling, Patcham Infant and Peter Gladwin schools.

The highest proportion in secondary schools were at: Blatchington Mill, CNCS and Hove Park. The lowest being at Patcham High, PACA and Longhill.

The admission criteria do not prioritise places in accordance with these characteristics. From information gathered about pupils attending primary schools it would be possible to determine the context of a secondary school's catchment area but as parents are not compelled to apply for their catchment area school any examination of a possible outcome is difficult to achieve.

In relation to children from minority ethnic backgrounds the responses to the consultation commenting upon this suggests that the council should consider the mix of pupils in areas of the city and how any change to the proportion of pupils attending a secondary school may affect pupil's sense of belonging and academic performance.

Where there are catchment areas served by one school with a greater proportion of children and families from different ethnic groups the proposed arrangements will provide them with a greater opportunity than they would have previously had to attend a school outside of their catchment area. Where those from different ethnic groups are in two school catchment areas if they are not eligible under Criteria 1-6 they will be negatively affected by the implementation of the proposals due to greater priority being available to others if seeking a school in their local catchment area.

Random allocation is used as a tie-break and therefore takes no account of ethnicity or other protected characteristics.

In January 2024, a total of 1363 pupils entitled to FSM had English as an additional language and they have an opportunity to be prioritised for a school place above other groups and therefore can be considered to have a greater priority under the proposed arrangements than currently.

Children with English as a Second Language: There is a concern that the current application guide is complicated and may be difficult for parents with lower educational achievement or those who have English as a second language to understand. They may also apply late for a school place and this would not provide them with the opportunity to benefit from the admission criteria because late applications are handled after all on time applications. The council's Ethnic Minority Achievement Service (EMAS) responds to the diverse and changing demands of the English as an Additional Language population in primary and secondary schools across the city. The service is aware of the difficulties families may have in understanding and completing school applications and provide support where appropriate. The

council's school admissions team also provide a range of ways in which parents/carers can seek advice or support from emails, telephone calls and by seeing the team in person at secondary school open events. The information provided on the council's website is designed to be accessible and the text can be translated into a wide range of languages.

In January 2025 18.3% of primary pupils had language other than English.

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

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

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#### 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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#### 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.

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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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#### 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.

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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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#### 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.

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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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#### 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.

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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)?	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>In such ways as those people with these characteristics with children due to start secondary school in September 2026 and where expectations have been as to how school places will be allocated and this has facilitated their family life.</p> <p>Should the circumstances of their school application be affected by the introduction of a higher criteria that prioritises other children it will risk potentially disadvantaging them if their characteristic means it would assist them to have their child placed in their catchment area school. Appropriate transport arrangements for children allocated a school out of their local catchment will assist in mitigating this.</p> <p>This is a similar impact to those with a disability whereby the logistical ease, friendship groups and sense of community support those with these characteristics to ensure their parental responsibility for regular school attendance.</p>
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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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#### 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)	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 common application form does not ask any questions on a child or family's status.

The admission criteria do not prioritise places in accordance with these characteristics. From information gathered about pupils attending primary schools it would be possible to determine the context of a secondary school's catchment area but as parents are not compelled to apply for their catchment area school any examination of a possible outcome is difficult to achieve.

The Council's Ethnic Minority Achievement Service provides support to certain families where English is an additional language and are able to provide some contextual information as to where there is a need.

The January 2025 Census indicated that in terms of English as an additional language (EAL) the overall percentage increased to 16.4%. The EAL proportion ranges in our schools between 4.5% and 69% and there were 128 distinct languages other than English recorded.

In January 2025 16.4% of pupils were recorded as being EAL. The proportion of pupils in primary schools was 17.7%. The percentage of pupils where parent/carer/self-identified ethnic group is other than White British, Refused or Not Known is 32.2%, the range in the city's schools was between 12.1 % and 82.7%. The primary schools with the highest proportion of pupils with EAL are: St Mary Magdalen Catholic Primary School, St John the Baptist Catholic Primary School, St Mark's CofE Primary School, St Paul's CofE Primary School and Nursery, Queen's Park Primary School, Brunswick Primary School, Fairlight Primary School, Moulsecoomb Primary School, West Blatchington Primary and Nursery School, St Andrew's CofE Primary School and St Bernadette's Catholic Primary School. The secondary schools with the highest proportion of EAL pupils are: Hove Park School, CNCS, King's School and Blatchington Mill School.

All community schools are expected to meet the needs of pupils without an EHCP and in many cases when they have an EHCP as well. Schools have access to support and guidance for families with these characteristics.

Where there are catchment areas served by one school with a greater proportion of children and families with these characteristics the proposed arrangements will provide them with a greater opportunity than they would have previously had to attend a school outside of their catchment area. Where those from different ethnic groups are in two school catchment areas they will be negatively affected by the implementation of the proposals due to greater priority being available to others.

Random allocation is used as a tie-break and therefore takes no account of these characteristics.

Of those pupils entitled to FSM and recorded as being EAL they have an opportunity to be prioritised for a school place above other groups and therefore can be considered to have a greater priority under the proposed arrangements than currently.

Pupils whose special educational needs and disabilities (SEND) needs qualify them for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon.

Parents with disabilities identified that they may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly.

It was reported that the complexity of the admission arrangements may have a negative impact on those with these characteristics in relation to their ability to read and understand how the admission process would work.

## 6.12 [Carers](#):

**Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).**

YES

### 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.

During the consultation we heard that Young Carers and their families will be as affected by the proposed changes as those with SEND.

The DfE request schools complete a Young Carer indicator in the spring term census. The Young Carer indicator identifies whether children have been identified as a young carer and if so, by whom.

Section 17ZA of the Children Act 1989 says a young carer is a person under 18 who provides or intends to provide care for another person (which isn't to a contract or voluntary work).

The recording and handling of this information is at school's discretion.

The self-reported total of young carers differs from the school recorded list, as outlined below.

- Primary Phase Self -Reported – 8%
- Primary Phase School Reported – 0.7%
- Secondary Phase Self-Reported – 6.4%
- Secondary Phase School Reported – 1.1%

In line with what has been outlined above for those with disabilities, these proposals may impact on pupils with caring responsibilities or their parents if they are carers, if they currently have arrangements in place which minimise any negative impacts managing within a community school. For example, being able to be placed with a friendship group or trusted and recognised adults. Or where journeys to secondary school are longer and/or undertaken using public transport.

The January 2025 census stated there was 290 pupils recorded as being Young Carers. 183 are in secondary schools and 107 in primary schools. The highest number of Young Carers in primary school are in Year 6 (39) then Year 5 (36). 77% are recorded as White British and approximately 59% have no SEND. 19 have English as an additional language. The number of Young Carers reported in the school census has risen from 208 in 2023.

Where these proposals may impact on parents with caring responsibilities is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life.



These factors are likely to have a negative impact when a child's allocation of a school place is either outside of the catchment area or not one of the family's preferred schools. The risk of this occurring will be increased when a child's priority for a school place is affected by changes to the admission arrangements. In the case of these proposals this may affect children living in a catchment area where places allocated to those with a higher priority mean insufficient places for all children living in the catchment area or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school.

The engagement exercise showed that many consultees did not want to see changes being made to the admission arrangements in relation to specific changes and collectively because of the potential impact of generating more uncertainty in the school application process, the risk of being placed away from support networks and friendship groups, and the impact of longer journeys to school. Thereby creating additional logistical issues that would place additional strains on family life.

Parents with caring responsibilities identified that they may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly.

A child's mental health was an often used example of a negative impact that may follow the implementation of these proposals.

The Parent and Carer Council's submission, which not written to either support or contest the proposals questioned if Young Carers would be given Criteria 2 status. It was felt that this group should be afforded protection as a vulnerable group at risk of disadvantage and wanted their need to be recognised by the Council's admission arrangements.

349 consultees to the consultation stated that they were a carer which was 9% of responses. Consultees were then asked, if 'Yes' was provided to the question about being a carer, who they cared for. 418 replies stated parent and 119 a child with SEN. If they care for more than one person, all that apply could be ticked. We asked people to mark other if none apply.

### 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.**

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.

### 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

#### 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:

<b>Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and 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.

Mainstream community schools are expected to meet the needs of all pupils without an EHCP (as well as many that do) and are required to make reasonable adjustments in line with equality duties thereby providing support to pupils whose circumstances have been affected by domestic and/or sexual abuse and violence survivors, as well as those in vulnerable situations.

Where these proposals may impact on pupils who face or live within a family that faces these circumstances are where mitigations are in place to minimise the negative impacts of managing within a community school are affected. For example, being able to be placed with a friendship group or trusted and recognised adults. Or where journeys to secondary school are longer and/or undertaken using public transport.

Where these proposals may impact on parents who have experienced vulnerable situations is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life due to their experiences.

These factors may have a negative impact when a child’s allocation of a school place is either outside of the catchment area or not one of the family’s preferred schools. The risk of this occurring will be increased when a child’s priority for a school place is affected by changes to the admission arrangements. In the case of these proposals this may affect children living in a catchment area where places allocated to those with a higher priority mean insufficient places for all children living in the catchment area or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school. Against that for some vulnerable children, especially those in a single school catchment, the proposals provide an enhanced opportunity to address their vulnerability by giving a prospect of being allocated the school of their choice.

The engagement exercise showed that many consultees did not want to see changes being made to the admission arrangements in relation to specific changes and collectively because of the potential impact of generating more uncertainty in the school application process, the risk of being placed away from support networks and friendship groups. Thereby creating additional logistical issues that would place additional strains on family life.

Parents who have experienced vulnerable situations may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly. Appropriate transport arrangements and support from the school tailored to an understanding of the vulnerabilities and situation of the pupil and their family will assist with his.

A child’s mental health was an often used example of a negative impact that may follow the implementation of these proposals. Several comments from the consultation highlighted the potential

negative impact on children's mental health, especially for those who are already behind due to COVID-19 disruptions. The changes were seen as adding stress and uncertainty, which could exacerbate existing mental health issues

Under criteria 2 of the school admission arrangements consideration can be given to exceptional and compelling reasons as to why only one school can meet the needs of a particular child. Those who have experienced children or their families that have experienced vulnerable situations may therefore qualify for consideration under this priority criteria and as such be highly likely to obtain a place at their preferred school, which may well be their catchment school.

Significant concerns raised about the potential for increased journey times for those with protected characteristics and whether they would be further disadvantaged as a result.

Children from Single-Parent Families were identified as a group in a vulnerable situation, because of the impact on supporting the needs of their family, making arrangements to fulfil their statutory duty to ensure regular school attendance and may not quite meet the FSM criteria offering greater opportunity in the oversubscription criteria.

The consultation raised questions about the complexity of the detailed documentation accompanying the consultation noting that it is not the best way to explain changes to time-poor parents, especially those where English isn't their first language or those who have educational needs.

Using January 2024 data the schools with the highest number of pupils with 4 vulnerable factors were: CNCS, Hove Junior, Blatchington Mill. Hove Park, St Mary Magdalen, West Blatchington, Varndean and Patcham High with at least 9 pupils each.

#### 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

#### 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 responses to the consultation felt that the FSM policy and open admission proposal could go a long way to address giving the most disadvantaged children greater choice and opportunity.

Many comments highlight the potential benefits of including Whitehawk in the Dorothy Stringer and Varndean catchment area, as it could provide children from this deprived area with better educational opportunities. However, there are concerns that the changes might not be effective in the long term due to the 20% open admission criteria, which could disadvantage children from Whitehawk who do not have a sibling link or are not eligible for Free School Meals (FSM).

There was a call for admission and catchment areas to be considered in line with fairness for all children, no matter where their families can afford to live. Some felt that plans promoting fairness and opportunities for children from deprived areas must come above the needs of children from affluent areas

Several comments mentioned concerns about the increased travel distances and this was seen as particularly challenging for families without access to private transportation.

The proposed admission arrangements seek to advance the opportunity of admission to a preferred school of those who qualify for free school meals and those who live in a single school catchment area which in the city includes areas of disadvantage.

The School Admission Code only allows limited criteria to be used when forming the oversubscription criteria and elements of the Pupil Premium, including FSM eligibility can be used. The code does not allow any other priority to children according to the occupational, financial or educational status of parents applying.

The consultation received a number of responses both in support and against the proposals on the basis of its potential impact. Those supportive of the proposals often cited the positive impact it could have on those encountering socio-economic disadvantage. Some of those critical to the proposals cited that this was not the only measure of such disadvantage and was therefore not fairly applied to all those experiencing such circumstances. Others outlined that the impact on catchment areas with two schools did not allow for any consideration of families and pupils living in those areas and encountering socio-economic advantage when being considered for the open admission criteria, although they would have the opportunity to apply for other schools under the FSM criteria.

In addition to the proposal to include an additional oversubscription criteria the Council is proposing a change in the catchment boundary between Longhill High School and Dorothy Stringer/Varndean schools. The area involved covered by postcodes BN2 5 and BN2 1 contains areas of disadvantage. As the proposals mean that some pupils and families will be moved from a single catchment area to a dual catchment area it will mean that they are denied an opportunity to use the open admission criteria. In addition, those moving from the dual catchment area may consider their opportunities to be reduced as their catchment area will no longer be served by 2 oversubscribed schools rather a school that is undersubscribed and has a lower Ofsted judgment than the other schools.

The accompanying report and appendix 11 outline the responses received in the consultation.

The number of children who are in receipt of FSM and have SEND was 2046 in January 2024, more current data is not yet available.

## 6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	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.

## 6.18 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 being housebound due to disabilities or disabling circumstances
  - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
  - 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

The consultation has predominantly heard concerns about the impact of these proposals on those with protected characteristics in relation to having less opportunity to attend their catchment area school. At the same time, those supporting the introduction of an open admission category for families living in a single school catchment area, increasing the FSM proportion of places available to 30% and the move of catchment boundary lines have cited the positive impact it will have on those with characteristics outlined above.

As concerns have been expressed by those negatively affected about the implications for family life, absence of supportive networks and risks to mental health this could affect lone parents who may also encounter logistical difficulties in relation to getting their child or children to school(s) and managing when illness prevents attendance at school. The potential of a limited support network would add further disruption for this group. The Council is not able to confirm any data in relation to the number of children living in single households in the city, their location and the preferred secondary schools choices that they would hold.

Concerns were expressed about the ability to understand the interplay between the different elements of the oversubscription criteria and the complexity of the information shared in the consultation. As such, people facing literacy, numeracy and /or digital barriers may not have fully understood the implications of the proposals being consulted upon and in future, if determined, how the oversubscription criteria will affect them when applying for a school place.

The council engaged with other community groups to ensure that a wide range of views were gathered including at events that were run in a different way to an open, public consultation.

The Council knows that the vast majority of applications are made online and also ensures that parents can make contact with the school admission team as part of the application process. The team regularly attend secondary school open evenings and speak directly to families about the process.

Cumulative effects are likely to be experienced by those whose children have SEND as a result of the impact of managing a child's needs before and after formal schooling together with the demands that schooling itself places on the child. We know that there can be a high correlation between families with children with SEND and socio-economic disadvantage and this will be compounded if the family live in a dual catchment areas and the family do not have a sibling link to one of their catchment area schools as those children would have a lower ranking in the oversubscription criteria than they would do under the current arrangements.

Through the analysis the Council needs to be mindful of the impacts on families experiencing multiple forms of disadvantage and the compounding effects of disability, poverty and single parenthood may have. Although no data sources can be used to identify the scale of the impact and the geographical locations of the city where that may be most prevalent.

## 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"> <li>The Council will seek to ensure its arrangements to consider criteria 2 applications and requests for travel assistance both comply with statutory requirements and ensure that holistic view of the pupil's circumstances can be considered fairly. Where consideration of families facing multiple disadvantages is made, in addition to considering a clear communication strategy in multiple languages regarding the arrangements in place and the appeals process available to them.</li> </ul>   |
| <ul style="list-style-type: none"> <li>The Council will continue to explore the appropriate travel assistance provided to families on public transport and other means as necessary to ensure that where there is an impact on a family and pupil not receiving a place at their catchment area school this is supported in line the council's relevant policies. A review of the Home to School Transport policy will take place informed by the new admission arrangements adopted</li> <li>Schools will be supported to ensure that they remain able to meet the need of the children offered places and that careful consideration is made to consider clear metrics to measure the impact that changes in admission arrangements may bring for those starting school in September 2026. For this to be feedback to school leaders as well as affected families, with regular review points planned to assess outcomes.</li> </ul> |

#### 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.

If required after determination, these identified actions will be taken into service business plans to ensure oversight and delivery beyond the report's publication and are in place for September 2026 with the enacting of the agreed policy.

## 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 to amend and change admission arrangements and/or changes to catchment areas as demographics and circumstances of a local area changes. In recent months the Council has conducted an engagement exercise on potential changes to secondary school catchment areas and a formal consultation on its admission arrangements for September 2026 with over 5000 responses in total. As such the Council is confident it understands the implications of the proposed changes.

There are some aspects of the School Admissions Code that preclude the Council from making additional adjustments to mitigate the impact of its proposals. The system also provides through Criteria 2 and the statutory independent appeal process a pathway for a child or family’s individual circumstances to be considered. In the case of the appeal panel this is after the allocation has been made.

The views heard about the proposals were not unanimous and care needs to be taken to consider where there are complex impacts.

The School Admissions Code requires admission authorities to ensure that Oversubscription criteria are be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation. Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs. As such, the Council’s conclusion is that where there may be disadvantage so others with protected characteristics will also benefit. Therefore, no unfair disadvantage occurs rather the arrangements re-prioritise how the admission arrangements for community secondary schools in Brighton and Hove function.

The modelling the council has conducted on the likely outcome of the proposals, taken individually and as a whole, relies on informed assumptions about a number of variants, which it is recognised may change over time. The consultation has drawn out more information from consultees to help inform the decision to be taken. The report details mitigations that can be made to better support families in the city and after its operation in September 2026 more information will be known and as admission arrangements are determined annually it will give the Council an opportunity to reflect and receive feedback on those arrangements in the autumn of 2026 at a time when arrangements for September 2028 will be expected to be consulted upon. This will involve having clear metrics for measuring impact once implemented, regular review points to assess outcomes and implementation of robust mitigation measures for identified negative impacts such as the use of criteria 2, travel assistance and support to school staff to meet the needs of the learners attending their schools. It is also recognised that for all pupils, but especially those pupils and families with protected characteristics, the excellent quality of education and support to which the city aspires should be available to all pupils, irrespective of the school allocated or its location.

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

The recommendation of the EIA is to proceed with caution noting that Council’s will often amend and change admission arrangements and/or changes to catchment areas as demographics and circumstances of a local area change. The Council has recently undertaken two consultation exercises and received over 5000 responses in total meaning that the Council should be confident it understands the implications of the proposed changes.

There are some aspects of the admission arrangements that provide an individual pathway for a child or family’s individual circumstances to be considered. In the case of the appeal panel this is after the allocation has been made.

The views heard about the proposals were not unanimous and care needs to be taken to consider where there are complex impacts. Where there may be disadvantage so others with protected characteristics will also benefit and so it can be concluded that no unfair disadvantage occurs rather the arrangements

re-prioritise how the admission arrangements for community secondary schools in Brighton and Hove function.

The most significant impact will be on children seeking a place in a community secondary school who live in a catchment area but do not have an older sibling attending the catchment school or are not eligible for Free School Meals (FSM). Their priority for a place will be lower than in previous years. Conversely, children entitled to FSM or living in a catchment area served by one school will receive a higher priority for a school place than in previous years, and choice that was not otherwise available to them purely by virtue of their location.

Pupils with SEND who qualify for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon. Mainstream community schools are expected to meet the needs of all pupils without an EHCP and are required to make reasonable adjustments in line with equality duties. However the proposals may negatively impact pupils with disabilities where mitigations in place to minimise the negative impacts of managing within a community school are affected. For example, being placed with a friendship group or trusted adults, or where journeys to secondary school are longer and/or undertaken using public transport.

A child's mental health was often cited as a potential negative impact following the implementation of these proposals where there would be less prospect and greater uncertainty under the proposals of getting the school of their choice. However, for some children the proposals will mean a greater opportunity to be allocated the school of their choice, especially those with a socio-economic disadvantage as eligible for FSM, or in single school catchment areas with little choice available to them in practice.

Concern was expressed that the complexity of the arrangements being consulted upon meant the implications have not been fully understood and as such people have not been able to comment appropriately to the consultation. Any changes that are determined will need to be clearly explained and any barriers to understanding these will need to be overcome.

Parents with certain protected characteristics may struggle to make the arrangements required to ensure their child attends regularly, especially if the child is allocated a school place outside of the catchment area or not one of the family's preferred schools.

The main report covers many of the issues highlighted within this EIA and provides details on further considerations that will be required.

## 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 Full Council paper for its meeting on 27 February 2025

## 10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Richard Barker, Head of Education	13.2.25
Accountable Manager:	Deb Austin – Corporate Director for Families, Children and Learning	17.02.25

**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 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:	Eric Page	13/02/2025
EDI Manager:		
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:

