

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. 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.

Name of activity or proposal being assessed:	Proposed School Closure – St Joseph's Catholic Primary School
Directorate:	Families, Children & Wellbeing
Service:	Education & Learning
Team:	Education & Learning
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes Closure of St Peter's Community Primary School, Homewood College and St Bartholomew's Church of England Primary School

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

Responsible Lead Officer:	Richard Barker, Head of Education
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	The Catholic Diocese of Arundel & Brighton

3. About the activity

Briefly describe the purpose of the activity being assessed:

In response to the fall in pupil numbers in the city, the Governing Body of St Joseph's Catholic Primary School is proposing the closure of St Joseph's Catholic Primary School.

The proposal to close St Joseph's Catholic Primary School is necessitated by:

1. Declining pupil numbers across the city creating significant financial pressures that make maintaining the current number of schools unsustainable
2. The Diocese of Arundel & Brighton's assessment that maintaining multiple Catholic schools in the city with current enrolment trends is not viable
3. The risk that maintaining an under-enrolled school would lead to deteriorating educational provision for remaining pupils due to reduced resources and curriculum options
4. The availability of sufficient alternative school places within reasonable distance, including other Catholic schools in the city.

Whilst it is acknowledged that the school closure will be of significant importance to many communities, including children in vulnerable circumstances, Catholic families, and those with specialised needs, there is a difficult balance of addressing these important individual needs while also meeting the responsibility to support all students throughout our educational system. We recognise the feeling of loss that a long established and well-loved school closure brings to a community.

The extensive mitigation measures identified in this assessment represent the maximum proportionate response, while still achieving the necessary reorganisation of school provision to ensure long-term sustainability of education in Brighton & Hove.

It is proposed that the Council proceed and are responsive to ensure these mitigations are effectively implemented and that any unforeseen impacts are swiftly addressed.

This EIA is looking at the impacts of the proposed closure to ensure that groups affected have been considered fairly and to help inform decision making. This document takes account of the Government's updated guidance on the Public Sector Equality Duty that outlines the purpose of an EIA and states:

It is for the decision-maker to decide how much weight should be given to the various factors informing the decision. The duty does not mean that decisions cannot be taken which disadvantage some people (provided this does not constitute unlawful discrimination), but the decision-maker should be aware of the equality impacts of these decisions and consider how they could positively contribute to the advancement of equality and good relations. The decision-maker should consider ways of preventing or balancing the effects that their decision may have on certain groups. They should decide which mitigations, if any, they might want to put into place in reconsidering the decision. The mitigation should be proportionate to the problem at hand.

Therefore, compliance with the general duty involves consciously thinking about the equality aims while making decisions. There is no prescribed process for doing or recording this.

It is proposed that the school closes on 31 August 2025 resulting in all pupils needing to move to new schools and staff's employment being ended on that date. At the time of writing there were 69 pupils on roll.

What are the desired outcomes of the activity?

That Full Council agrees to the closure of St Joseph's Catholic Primary School following the public consultation and issuing of statutory notices by the Governing Body of the school.

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

The proposal will primarily impact on primary school age children, aged 4-11 who currently attend the school or may have wished to attend the school and their families (parents/carers).

Staff employed at the 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 Governing Body of the school, supported by the Catholic Diocese of Arundel and Brighton has undertaken a public statutory consultation from 13 January 2024 to 17 January 2025 and subsequently published a statutory notice on 24 February 2025 proposing closure of the school. This was followed by a further four weeks period during which time representations could be submitted regarding the proposal. Consultations have also taken place with staff and unions.

There was a well-attended public meeting in December 2024. There were 98 responses received to the consultation and no representations made during the statutory notice period.

The summary of the responses to the consultation can be found in Appendix B of the Report.

Staff had been consulted on the impact of the closure of the school, including individual consultations and direct access to dedicated HR support.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES

Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	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?

Formal data responses to the Department for Education about pupils and staff are compiled by the school and submitted by the Council. The Council only has available the data made publicly available. More information may have been supplied by responders to the consultation on the proposals to close the school that took place in the autumn.

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

The Council commits to continuous monitoring of the impact of this decision and will report back regularly to relevant oversight bodies on the effectiveness of mitigation measures and any additional actions required to support affected pupils and families.

The Council will monitor the impact of the closure on homeless families through ongoing engagement with housing services and relevant support organisations.

The Council will ensure that children's views are sought and considered throughout the process, honouring their right to have their opinions taken into account in matters affecting them.

The Council will be monitoring outcomes for those with intersecting characteristics to ensure support remains effective and responsive throughout the transition process.

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

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.	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 negative disproportionate impacts are on:

- School-age children (4-11 years) currently attending St Joseph's Catholic Primary School, born between approximately 1/9/2018 and 31/08/2015. It will also affect parents of children born between 1/09/2019 and 31/08/2020.
- Excluding the 24 pupils in Year 6 who will move to secondary education in September, the school currently has 30 pupils still on roll. Of these, 12 pupils are yet to be allocated an alternative school place for September.
- There are 197 available school places within reasonable distance from St Joseph's, including:
 - 147 places across 7 schools within one mile of St Joseph's
 - 50 places in Catholic schools in the wider city area

The Diocese has committed to consider financial transport support for Catholic families wishing to move their children to another Catholic school in the city.

- The consecutive transitions faced by the Year 5 cohort, moving to a new school for Year 6 and then to secondary school for Year 7, present significant psychological challenges. These students will navigate three different educational environments in three years, potentially experiencing amplified anxiety, academic disruption, and social instability during a critical developmental period. This doubled transition burden coincides with early adolescence, when peer relationships become increasingly central to identity formation, making the repeated social integration particularly demanding and potentially affecting students' emotional well-being and academic engagement.
- A comprehensive support plan spanning both transitions will be implemented. Key elements include multiple familiarisation visits to the new school, implementation of buddy systems, enhanced parent communication, and secondary transition planning. Throughout both moves, detailed handover procedures should extend beyond academic records to include social and emotional considerations,
- Younger children generally may find settling into a new school more difficult than older children.
- Families with siblings in different year groups may find that their children cannot attend the same new school, as the school might not have available places across all the relevant year groups.

- Staff working at the school, especially those who have been working there for a long time and/or older age groups who may find obtaining a new job and transition to a new place more difficult.
- From the consultation, there was a wide split of ages from respondents ranging from 16-85+ (66%) with 34% choosing not to say. Views of pupils were sought by the school.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Vulnerable children who would be particularly affected by moving schools are identified and supported with the change of schools.
- Appropriate support is provided by Brighton & Hove Inclusion Support Services (BHISS) and Schools Mental Health Service, to assist the transition for identified pupils.
- A “team around the school” approach will bring together a professional network around the needs and strengths of each child and will identify any individual action plans, if appropriate, for certain children.
- Receiving schools are made aware of the impact of transition so that appropriate support can be provided.
- Families who have expressed a preference for St Joseph’s Catholic Primary School for Reception in September are informed about the closure proposal and Schools Admissions will support those to find alternative schools.
- A school place is available for each child in each year group. Details regarding alternative schools can be found in the report.
- Council’s school admission team to be aware of the issue with siblings and to work with families to facilitate them attending the same school where possible.

6.2 Disability:

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

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

The negative disproportionate impacts are on:

- Children with Special Educational Needs and Disabilities (SEND) who have an Education, Health & Care Plan (EHCP) – there were 8 pupils with EHCP at the time of writing.
- SEND and/or neurodivergent pupils moving schools can encounter additional challenges, such as anxiety, disruption to established support networks and routines, which are critical for neurodivergent pupils and potential challenges and concerns adapting to new physical environments. They will often require more support during transitions than neurotypical peers.
- Disabled parents/carers.
- Neurodivergent parents/careers will require more support during transition period.
- Those members of staff who are disabled or neurodivergent.
- Disabled families for whom travelling to a new school may be more difficult. Increased travel distances may disproportionately impact those with mobility issues

From the consultation, 54% said that they are not disabled, with 10% saying that they are disabled and 36% choosing not to say. From this 4% were physically disabled, 3% stated that they had a learning disability, autism or mental health condition and 3% had a long-standing illness.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Children with SEND who have an EHCP would be placed in a new school by the Council's SEN team. B&H mainstream schools are expected to meet the needs of pupils with EHCPs with additional support or resources as necessary.

Excluding the 24 pupils in Year 6 who will move to secondary education in September, the school currently has 30 pupils still on roll. Of these 12 pupils are yet to be allocated an alternative school place for September.

There are 197 available school places within reasonable distance from St Joseph's, including:

- 147 places across 7 schools within one mile of St Joseph's
- 50 places in Catholic schools in the wider city area

The Diocese has committed to consider financial transport support for Catholic families wishing to move their children to another Catholic school in the city.

The council has implemented a comprehensive transition support package in collaboration with the school and Diocese:

- A team-around-the-school approach has been established with fortnightly co-ordination meetings which started after Easter
- Professional support is being provided through the Inclusion Support Service, Schools Mental Health Service, and English as an Additional Language and Traveller Service (EALTS) (formerly EMAS)
- The Schools Admissions team is prioritising applications for St Joseph's pupils
- Special consideration is being given to pupils with EHCPs or those in the EHCP application process.
- The school uses the support systems in place including Education Mental Health Practitioners and access to Schools Mental Health Service.
- Families whose members are disabled who may need assistance with travel will be able to apply for transport assistance, subject to the Council's criteria.
- Ensuring that receiving schools are fully accessible to pupils and staff.
- Staff consultations are offered personal 1:1 discussions where individual circumstances can be discussed. Staff will also be offered additional support to apply for new roles.

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).

- Schools will be encouraged to identify families who require additional support to secure a new school place.
- Sufficient school places are identified within a reasonable distance of families, including those families with one or more disabled members.
- Brighton & Hove Inclusion Support Service (BHISS) & SEN Team will provide support for children with EHCPs to ensure that they move to an appropriate school that can meet their identified requirements arising from disability.
- The council will support parents to identify schools which they feel are able to meet their children's needs.
- Access requirements for pupils will ensure funding for supporting SEND pupils left at the end of the school year will follow the children to their new school.
- All children with EHCPs that need an annual review will have one.
- All children currently in the process of an EHCP assessment will have their assessment completed as usual.
- The Council will continue to set out its expectations to other schools in the city on this matter and ensure new children are received with welcome.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

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

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

The data available for pre-school pupils indicates an increasing percentage of Black and Racially Minoritised children for the city in general. The school population comprises: 33% White British/White English, 37% chose not to say and 30% other ethnicities (highest minority group: 7% Black African).

For Reception (September 2025), there were 8 first preferences, 9 second preferences and 13 third preferences, although no allocations were made to the school on National Offer Day (16 April). There is no comprehensive race/ethnicity data available for this cohort, so we are not able to see if there are any disproportionate impacts.

Proactive support will be given to ensure:

- All families can understand the decisions made and be supported to apply for alternative school places to ensure that they are allocated a new school.
- That there are sufficient surplus places in local schools for any late applicants.
- Black or Racially Minoritised families, including those families where English is their second language, or families with experience of trauma which has required them to seek asylum, are offered a welcoming and understanding approach.
- EMAS service will continue to reach out to communities to communicate the potential impact on their community and signpost to resources which will support families.
- An interpreter can be sourced upon receiving confirmation and consent from those who would need it.
- Any new school that pupils will move to provides culturally sensitive support and the appropriate cultural provisions for that family in place (for instance multi-faith rooms, dietary requirements etc).
- In case of reported discrimination, harassment or bullying due to a protected characteristic, in addition to school taking appropriate action as specified in policies and procedures, any pupils, or staff impacted will be provided with appropriate support and will be signposted to other support resources and relevant community organizations that can offer specialised assistance and advocacy.
- Schools are aware of the Anti-Racist Education Strategy and the comprehensive package of training and support that is available for schools.

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

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

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

The proposal to close St Joseph's Catholic Primary School will have disproportionate impacts on families seeking Catholic education for their children in Brighton & Hove:

- St Joseph's is a Catholic school, and its closure will reduce the number of Catholic school places available in the city.
- Some families specifically choose faith-based education in line with their religious beliefs, while others specifically prefer secular education. The closure of a Catholic school impacts the balance and availability of these options.
- The school's closure would reduce parental choice for Catholic education in particular geographic areas of the city, potentially requiring families to travel further to access faith-based education.

From the consultation, 38% chose not to disclose their religion/belief with 47% identified as Christian and 9% stating that they did not associate with any religion/belief and 6% identifying as other religions.

The Diocese has a sufficiency of places in Catholic schools for Catholic pupils within Brighton and Hove. There will therefore be sufficient Catholic school places within the city for pupils who require one. The closure timetable will ensure that there is consideration given to observance of religious days of significance to ensure that there is enough time outside of these to ensure parents/carers are able to engage in any necessary processes.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to [Gender Identity](#) and [Sex](#) (including non-binary and intersex people)?

YES

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: There are no single sex-maintained schools in the city and admission arrangements do not take into consideration the gender of the child. In January 2024, the gender split at St Joseph's Catholic Primary School was 33% female pupils and 67% male pupils. There may be children who are trans or who identify as non-binary who may require additional guidance and support during the transition period and while settling at a new school.

Parents/Carers: There may be parents/carers who are on maternity/paternity leave, or single parent families, and/or from same sex or non-binary families. This doesn't directly impact on school admission arrangements. Women are more likely to take on childcare responsibilities so may be disproportionately impacted by further school journeys, reducing their employment options. There may be additional burdens due to the cost of living and the disproportionate impacts that this may have on women due to the nature of their employment types and barriers to employment for those with sole childcare responsibilities. Families could find it harder to access community resources in the new school area and could experience discrimination.

Staff: Most roles at risk at the school are filled by women, meaning that staff redundancies would likely disproportionately affect women.

From the consultation, 53% of people said that they were female, 14% said that they were male, and 33% chose not to complete the equalities questions and did not identify what gender they were.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Where there is awareness of any circumstances where individuals need support, that they are supported and that the school is also supported in using the Trans Inclusion Schools Toolkit.
- In case of reported discrimination, harassment or bullying due to a protected characteristic, in addition to school taking appropriate action as specified in policies and procedures, any pupils, parents/carers or staff impacted will be provided with appropriate support and will be signposted to other support resources and relevant community organizations that can offer specialised assistance and advocacy.
- Assistance with transport will be provided in line with policies and procedures.
- Additional or bespoke support will be offered to those whose circumstances require it.

6.6 Gender Reassignment:

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

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

The data available about parent/carers and pupil's gender reassignment is inconclusive.

From the consultation, 33% chose not to answer this equalities question. 1% responded that their gender wasn't the same as the sex that they were assigned at birth.

The potential negative impacts of school closure may include:

- Fear of transphobia and lack of support in a new setting.
- Anxiety around being misgendered in a new school.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Where there is awareness of any circumstances where individuals need support, that they are supported and that the school is also supported in using the necessary toolkits, including Trans Inclusion Schools Toolkit.
- In case of reported discrimination, harassment or bullying due to a protected characteristic, in addition to school taking appropriate action as specified in policies and procedures, any pupils, parents/carers or staff impacted will be provided with appropriate support and will be signposted to other support resources and relevant community organizations that can offer specialised assistance and advocacy.
- Ensure that all the new schools are safe, non-judgmental, trans-inclusive spaces.
- Ensure full confidentiality and respect for people's chosen names and pronouns.

- If any barriers to access are identified by a person whose gender isn't the same as the sex assigned to them at birth when considering a transfer to a new school, the council will work to mitigate any negative impacts on a case-by-case basis, utilising resources such as the Trans Inclusion Schools Toolkit and will assist to ensure that every situation is dealt with compassionately and fairly and that bespoke assistance and support is available if individuals request it.
- Additional or bespoke support will be offered to those whose circumstances require it.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

There are no identified disproportionate impacts because the data is not available. However, we are aware that homophobia and discrimination based on sexual orientation remains a prevalent issue.

From the consultation, 61% who provided details on their sexual orientation were submitted by heterosexual respondents, 2% by bisexual/other respondents, 37% preferred not to say.

If any LGBTQIA+ individuals indicate that they need support, then the council will work with the Diocese and the school to ensure that they are supported and that the school is also supported in guiding people through to resources and signposting support. Voluntary sector LGBTQIA+ organisations are available to support children and families in the city.

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.

There are no identified disproportionate impacts on this group and the data available about parent/carer marital or civil partnership status is inconclusive.

There may be a risk of discrimination around civil partnerships and same sex marriages and families may find it harder to access community resources in the new school area.

If there are any circumstances where individuals need support, then support, as well as guiding people through resources and signposting to additional sources of support will be provided.

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>There is no data about pregnancies of the parents/carers in the cohorts of pupils that are affected by the closure. However, there may be parents/carers in situations where they are on maternity/paternity/parental leave or caring for younger children, who may find it difficult to get older children to a new school. Pregnant people could find it harder to access different school communities which are at further distances from their home.</p> <p>Staff on maternity/paternity/parental leave would need to be involved in the redundancy consultation, which will be considered to ensure that every situation is dealt with compassionately and fairly.</p> <p>To mitigate this the Council will work with the school and the Diocese to ensure:</p> <ul style="list-style-type: none"> • Where there is awareness of any circumstances where individuals need support, that they are supported and that the school is also supported in using the necessary toolkits and resources. • Additional or bespoke support will be offered to those whose circumstances require it. • HR advice will be provided for pregnant school staff, and their individual circumstances can be discussed as part of the staff consultation process.
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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.

There is no data about any disproportionate impacts in the cohorts of pupils and families that are affected by the closure
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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)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

There are refugee families identified as being on roll at St Joseph's, and this group is likely to already have experienced trauma and significant change and upheaval in their lives. Children's academic outcomes may be impacted as a result of previous experiences of racism, upheaval of school situation and other cumulative factors.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Translation and interpretation services are provided for families that need to apply for a new school place.
- Interpreters can be sourced upon receiving confirmation and consent from those who would need it.
- EMAS is available to reach out to families and signpost resources which will support families.
- Any new school that pupils will move to provide culturally sensitive support and the appropriate cultural provisions for that family in place (for instance multi-faith rooms, dietary requirements etc).
- In case of reported discrimination, harassment or bullying due to a protected characteristic, in addition to school taking appropriate action as specified in policies and procedures, any pupils, parents/carers or staff impacted will be provided with appropriate support and will be signposted to other support resources and relevant community organizations that can offer specialised assistance and advocacy.
- Incoming schools will be reminded that pupils have already experienced upheaval and trauma in their lives as a result of their families having to seek asylum from their parents' country of origin and that pupils and their families may need additional support and reassurance to transition to a new school.

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.

The negative disproportionate impacts can be experienced by parents/carers who are also carers for other family members, such as elderly relatives or disabled family members. They may face additional challenges in managing new school travel arrangements alongside their existing caring responsibilities. Young carers who are pupils at the school may face disruption to their established routines, which could increase their stress and caring burden.

The consultation indicated that 10% of respondents identified as carers, suggesting a significant carer population connected to the school community. Carers often have less flexibility in their schedules due to care commitments, making adaptation to new school routines, locations, and timings particularly challenging. Carers may also face additional financial pressures related to potential increased travel costs to new schools, particularly if they need to accompany the person, they care for to medical appointments that conflict with new school schedules.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Pupils who are young carers are identified and receiving schools are aware of their status, so appropriate support can be provided.

- Support for parent/carers with caring responsibilities to find school places that minimise additional travel time or that align with their caring responsibilities.
- Signposting to the Carers Centre and other relevant support services for carers who may need additional assistance during this transition period.
- Consideration of transport assistance for families where a parent/carer's caring responsibilities would make it difficult to transport children to a new school.
- Schools are made aware of the challenges facing carers, including the potential need for flexibility regarding attendance, punctuality and participation in school activities.
- Sibling placements in the same school are prioritised to reduce logistical challenges for carers with multiple children.

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).

NO

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

If “YES”, what are the positive and negative disproportionate impacts?

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

There are no identified disproportionate impacts on this group because there are no identified groups in the cohorts at the school.

Foster carers may face additional challenges in managing new school routines alongside other fostered or birth children who may attend different schools.

Brighton & Hove City Council have adopted Children in Care and Care Experienced as a protected characteristic, and both have the top admission priority when applying for school places.

Data shows that looked after children and previously looked after children already experience poorer educational outcomes than their peers, and additional school disruption could exacerbate this gap. The Virtual School has a responsibility to support Children in Care and those known to a social worker.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

YES

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 closure of St Joseph's Catholic Primary School may disproportionately impact families experiencing homelessness or housing insecurity in the local area. These families often face greater challenges in accessing and maintaining consistent education for their children due to unstable living arrangements.

Families in temporary accommodation near the school may have specifically chosen St Joseph's due to its proximity, and relocation to another school could increase travel time and costs, creating additional financial burden.

School often provides essential stability, routine, and support services for children experiencing homelessness, and disrupting these connections may exacerbate existing vulnerabilities. Homeless families tend to experience higher mobility, making them more likely to join schools mid-year; the closure reduces options for these families when they move into the area.

Additionally, families at risk of homelessness who are currently part of the school community may lose important support networks that help prevent housing crises.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Housing services are informed about the school closure to enable coordinated support for affected families in temporary accommodation.
- Families experiencing homelessness or housing insecurity will receive priority support in finding appropriate alternative school placements that minimise disruption.
- The Council will ensure information about the school closure and alternative options is accessible to families in temporary accommodation, including through housing support workers and homeless services.
- Transport assistance will be considered for families in temporary accommodation who may need to travel further to a new school.
- Schools receiving pupils from families experiencing homelessness will be provided with information about available support services and resources.
- The transition process will include identification of any additional needs these children may have, ensuring appropriate support is in place at receiving schools.
- The Council will monitor the impact of the closure on homeless families through ongoing engagement with housing services and relevant support organisations.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

YES

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 proposed closure of St Joseph's Catholic Primary School may have significant impacts on families affected by domestic abuse or sexual violence. For some families, the school may represent a safe space and provide crucial support networks that help them manage or escape abusive situations.

Children affected by domestic abuse often rely on the stability and security that school environments provide, and disruption to these established relationships with trusted staff could be particularly harmful.

The need to move schools may expose vulnerable families to additional risk if perpetrators become aware of new routines or locations. Some families may have relocated specifically to be near St Joseph's to escape abuse, and being forced to find alternative schools could cause additional stress during an already traumatic period.

There may also be safeguarding implications where information about vulnerable children needs to be transferred between schools, with potential risks if this process is not handled with appropriate sensitivity and security.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Safeguarding leads at St Joseph's will identify families known to be affected by domestic abuse and ensure this information is securely transferred to receiving schools with appropriate protocols.
- The Council will work with specialist domestic abuse services to provide guidance on supporting affected families through the transition.
- Consideration will be given to keeping information about new school placements confidential where there are known safety concerns.
- Families affected by domestic abuse will receive priority support in finding appropriate alternative school placements that maintain safety and minimise disruption.
- Receiving schools will be provided with appropriate information and resources to support children who have experienced domestic abuse, while maintaining strict confidentiality.
- The transition process will be managed with heightened sensitivity to ensure that vulnerable families are not placed at additional risk.
- Affected families will be signposted to support services, including local domestic abuse organisations that can provide specialised assistance during the transition period.

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.

The closure of St Joseph's Catholic Primary School will likely have disproportionate impacts on families experiencing socio-economic disadvantage. Children from lower-income households may be more reliant on local schools within walking distance due to financial constraints affecting transport options.

The potential requirement to travel further to alternative schools may impose additional costs for transport, uniforms, and equipment that create significant financial pressure on already stretched households. Families experiencing poverty often benefit from the wraparound services, breakfast clubs, and after-school provision that they have established relationships with at St Joseph's; disruption to these support systems could exacerbate food insecurity and childcare challenges.

Parents in low-paid employment with limited flexibility may face difficulties accommodating new school routines, potentially affecting work arrangements and income. The school may also provide important community connections and support networks for economically disadvantaged families that will be disrupted by the closure.

Data shows that children from disadvantaged backgrounds are often more negatively affected by school transitions, with potential impacts on educational attainment and wellbeing.

To mitigate this the Council will work with the school and the Diocese to ensure:

- Financial support is considered for uniform costs when children transfer to new schools, with information about uniform exchange schemes made available.
- Transport assistance will be considered within for economically disadvantaged families who face increased travel distances to new schools and who fit the policy and procedure criteria.

- The Council will work with receiving schools to ensure continuity of free school meal provision and access to breakfast clubs and after-school provision, where possible.
- Information about the closure and support available will be communicated through multiple channels to ensure it reaches all families, including those with limited digital access.
- Support will be provided to help families navigate the school application process, with particular attention to those who may need additional support.
- Receiving schools will be encouraged to consider the needs of economically disadvantaged pupils in their transition planning.
- The Council will monitor the impact of the closure on pupils eligible for Pupil Premium funding to ensure appropriate support is maintained.
- Families will be signposted to relevant financial support services and community resources that can help during the transition period.

6.17 Human Rights:

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

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

While the closure itself does not remove access to education, it may affect the quality, accessibility, and suitability of education for some children, particularly those with special educational needs or from minority faith backgrounds.

The proposal potentially impacts the right of parents to ensure education in conformity with their religious beliefs, as St Joseph's provides Catholic education which may be important to families who specifically chose the school for this reason. Children's right to maintain stability in their educational environment will be affected, which could temporarily impact their right to develop to their full potential.

For some children, particularly those who are disabled or have additional needs, the disruption and transition could affect their right to receive education appropriate to their needs if suitable alternative provision is not secured.

To mitigate this the Council will work with the school and the Diocese to ensure:

- All children affected by the closure are guaranteed access to suitable alternative education without interruption, fulfilling the right to education.
- Parents' rights to choose education in accordance with their religious beliefs will be respected through support in finding alternative Catholic school places where desired and available.
- The Council will ensure that children's views are sought and considered throughout the process, honouring their right to have their opinions taken into account in matters affecting them.
- Particular attention will be paid to protecting the rights of vulnerable children, including those with special educational needs, to ensure appropriate educational provision continues.
- The transfer of pupils will be managed in a way that minimises any potential negative impact on their educational progress and wellbeing.
- The Council will ensure its actions are proportionate and necessary, balancing the broader public interest against individual rights.
- Clear information about the closure process and available support will be provided to all families to ensure transparency and fairness.

- The Council will continue to monitor the impact of the closure on affected children's rights throughout the implementation process.

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 closure of St Joseph's Catholic Primary School creates particularly complex and cumulative impacts for individuals with multiple protected characteristics or who belong to several vulnerable groups.

Children from Black and Racially Minoritised backgrounds who also have special educational needs may face compounded challenges during transition, with both racial and disability-related barriers potentially amplifying each other.

Disabled parents who are also experiencing socio-economic disadvantage may struggle significantly with new school logistics while managing financial constraints and accessibility needs.

Families with multiple children, including those with different needs (such as one child with SEND and one without), may face particularly complex challenges if suitable places for all siblings are not available at the same alternative school.

For children experiencing both housing insecurity and disability, the disruption could be especially destabilising, affecting both their sense of security and access to consistent support.

Lone parents who are also carers for elderly or disabled family members may face insurmountable logistical challenges if new school locations conflict with care commitments. Some staff members may face intersectional disadvantage, particularly those who are older, female, and with caring responsibilities, who may find securing alternative employment more challenging.

Staff will be at risk of being made redundant and may need to seek alternative employment. Where staff are impacted due to protected characteristics, the employer will need to ensure additional steps and

support are taken where necessary. Some staff have had long associations with the school and may therefore be disproportionately affected by the decision to close the school.

The Council recognises these complex intersectional impacts and will work with the school and the Diocese to provide individually tailored support packages for those with multiple vulnerabilities. This will include:

- A designated liaison officer for families with complex needs and children with multiple vulnerabilities, to coordinate services across education, social care, and health where appropriate.
- The Council ensuring receiving schools understand the full complexity of needs for children with multiple protected characteristics.
- Support plans addressing family's circumstances rather than addressing individual characteristics in isolation.
- The Council monitoring outcomes for those with intersecting characteristics to ensure support remains effective and responsive throughout the transition process.

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)

1. Establish a dedicated "team around the school" approach to co-ordinate the transition for all St Joseph's pupils and families through the school closure process
 - Team members already working within the school have been identified to assist in the transition team.
 - Pupil's needs, preferences and transition plans will be in place for each pupil.
 - Bi-weekly meetings were in place after Easter.
 - Ensure tailored transition plans are in place for all pupils identified vulnerabilities and familiarisation visits to new schools are in place for vulnerable pupils prior to transition.
 - St Joseph's pupils will be given a special admissions priority and the Council will ensure siblings remain together.
 - A peer support network will be established for pupils at their new schools to help their transition.
2. Establish information-sharing protocols with all receiving schools to ensure effective transfer of safeguarding information.
 - Confirm arrangements for secure information transfer procedures.
 - Schedule hand-over meetings between safeguarding leads at St Joseph's and receiving schools.
3. Provide employment transition support for St Joseph's staff.
 - Complete individual consultation meetings with all staff members.
 - Offer HR, Pension and Redundancy assistance for all staff to be able to assess their options.
 - Support staff to apply for other roles.

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 actions will be transferred to a Local Implementation Plan and will be monitored as part of the School Closure process.

8. Outcome of your assessment

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

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

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

The proposal to close St Joseph's Catholic Primary School is necessitated by:

- Declining pupil numbers across the city creating significant financial pressures that make maintaining the current number of schools unsustainable
- The Diocese of Arundel & Brighton's assessment that maintaining multiple Catholic schools in the city with current enrolment trends is not viable
- The risk that maintaining an under-enrolled school would lead to deteriorating educational provision for remaining pupils due to reduced resources and curriculum options
- The availability of sufficient alternative school places within reasonable distance, including other Catholic schools in the city

Whilst it is acknowledged that the school closure will be of significant importance to many communities, including children in vulnerable circumstances, Catholic families, and those with specialised needs, there is a difficult balance of addressing these important individual needs while also meeting the responsibility to support all students throughout our educational system.

The extensive mitigation measures identified in this assessment represent the maximum proportionate response while still achieving the necessary reorganisation of school provision to ensure long-term sustainability of education in Brighton & Hove.

It is proposed that the Council proceed and are responsive to ensure these mitigations are effectively implemented and that any unforeseen impacts are swiftly addressed.

The Council commits to continuous monitoring of the impact of this decision and will report back regularly to relevant oversight bodies on the effectiveness of mitigation measures and any additional actions required to support affected pupils and families.

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

The proposed closure of St Joseph's Catholic Primary School will impact most on those children and families who would remain on the school's roll in September 2025. However new school places will be identified for those children and where appropriate support will be provided to assist in the application process and their attendance at a new school. The reduction in Catholic school places is considered to have a minimal impact for those who wish to have a place at a Catholic school on account of their religious beliefs. The Council has experienced 3 previous school closures in recent years and is able to work with other schools to support the families and children undergoing this process.

9. Publication

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

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Richard Barker, Head of Education	14-Apr-25
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning	15-Apr-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
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EDI Business Partner:	Zofia Danin	08-May-25
EDI Manager:	Deborah Totney	08 May 2025

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:

