

## General Equality Impact Assessment (EIA) Form

### Support:

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

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

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

### Processing Time:

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

### Process:

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

### 1. Assessment details

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

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

Name of activity or proposal being assessed:	Public consultation on School Admission Arrangements 2027-28
Directorate:	Families, Children & Wellbeing
Service:	Education and Learning
Team:	School Admissions
Is this a new or existing activity?	Existing – although with some amendments

<b>Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)</b>	Yes – EAI from last year's public consultation on admission arrangements.
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## 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>	Saul Johnston, School Admissions Manager Carolyn Bristow, Service Manager – Policy and Business Support

## 3. About the activity

Briefly describe the purpose of the activity being assessed

The determination of admission arrangements for community schools in Brighton and Hove to take effect from September 2027.

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, to reduce the Published Admission Number (PAN) at Downs Junior School from 128 to 96 pupils, to reduce the PAN at Rudyard Kipling Primary School from 45 to 30 pupils, to amend the Secondary school admission priority criteria to allow the sibling link to apply regardless of the catchment area where families live and to make some changes to the waiting lists and reallocation pool process.

What are the desired outcomes of the activity?

To ensure that a thorough, robust and sound public consultation takes place to enable Council Members to make an informed decision on the city's admission arrangements by 24 February 2026. The desired outcomes of the changes in school admission arrangements are detailed in the accompanying full council report.

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

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

## 4. Consultation and engagement

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

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

The Council undertook a 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.

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. 344 responses were received this way. Between 65% and 80% of consultees did not respond to the equalities questions with the exact percentage depending upon the specific question. Of those that did 70% described their gender as female and 30% as male. 103 of 344 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. 89 consultees stated that their sexual orientation was best described as heterosexual/straight, 248 preferred not to say, 4 were described as Bisexual and 1 lesbian/gay.

17% of consultees stated that they had no particular religion or belief, 5% stated they were Christian, 3% were atheist and 71% did not answer the question.

16% of consultees stated that they were married, 7% stated that they had never married or registered in a civil partnership. 72% did not offer an answer.

1 consultee stated that they preferred not to say if they have been looked after by a Local Authority, 4 stated that they had been. 248 consultees did not answer the question.

In total 3 consultees stated that they had served in either regular or reserve armed forces, 93 answered no to this question. 1 consultee preferred not to say and 246 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>	NO
<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 arrangements. 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, 2026 and for the proposed changes for 2027.

No equivalent data source is available for those pupils whose application will be to start school in Reception in September 2027.

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 2028 may be proposed and determined in an activity that cannot start before 1 October 2026.

## 6. Impacts

### Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only the cumulative assessment section**.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - Consider a wide range (including but not limited to):
    - [Census](#) and [local intelligence data](#)
    - Service specific data
    - Community consultations
    - Insights from customer feedback including complaints and survey results
    - Lived experiences and qualitative data
    - [Joint Strategic Needs Assessment \(JSNA\) data](#)
    - [Health Inequalities data](#)
    - Good practice research
    - National data and reports relevant to the service
    - Workforce, leaver, and recruitment data, surveys, insights
    - Feedback from internal 'staff as residents' consultations
    - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
    - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

### 6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES
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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 2027 so those born before 31 August 2023 and between 1 September 2016 – 31 August 2017.

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 particular catchment area and have an older sibling attending an out of catchment school. Their priority for a place will be higher than in previous years should the proposed arrangements be determined. We do not hold data on the number of younger siblings due to start school in September 2027 or the number of single children or eldest siblings due to the start school that year.

We have 2394 pupils in the Year 6 cohort who are due to start secondary school in September 2027. 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 2231 places.

Of the 1403 responses to the equalities monitoring question about age in last year’s 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.

There were 113 responses to the equalities monitoring question about age in this years consultation, most identified as being in the age range 45-54 (50%), 42% were in the 35- 44 age range and 3% were in the 25-34 age range. There was one response from someone in their 60’s and 2 from those aged 70 or older.

**6.2 Disability:**

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

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

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

During last year’s consultation 27.9% of the responders 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.

In this year's consultation 27% of the responders to the consultation stated that their day-to-day activities were not limited because of health problems or disability. 5.5% stated they were, a little and 12.6% stated yes, a lot. 64.8% if responders did not answer the question. 34 responses answered if they had any of a list of conditions or illnesses or disabilities. The highest ranked responses were for a long-term physical illness (10) responses. A learning difficulty (8), Autism (4), other disability/medical condition (3) and a number of other options received 1 or 2 responses. 261 responses did not answer the question and 49 did not have a health condition.

In the October 2025 census figures collected showed a total of 25.13% of pupils are receiving SEN Support or have an EHCP:

- 18.96% of pupils are receiving SEN Support
- 6.17% of pupils have an EHCP

The changes proposed do not offer any disproportionate negative impact on families affected by disability as a discrete group. We know that disabled parents/carers may also find it more difficult to respond to an online survey, application process or to attend in person or online consultation meetings.

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 sibling priority to a school out of catchment area which could 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.

In response to past consultations families have identified 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.

Parents with disabilities also 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.

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

The 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.

### 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 common application form does not ask any questions on a child's ethnicity, race or ethnic heritage.

In January 2025, 32% (9,831) of pupils who supplied their data identified as an ethnicity category other than *White British*. This is an increase of 201 pupils since January 2024. The national figure is higher, at 38%\* of pupils. The three biggest ethnic groups (other than White British) in Brighton and Hove schools were: White - Other 5.0%, Mixed dual background - Other 3.6% and Mixed dual background - White & Asian 3.3%.

The primary schools with the highest levels of BAME pupils are: St Mary Magdalene'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.

The data available for pre-school pupils indicates an increasing percentage of children from Minoritised Ethnic backgrounds for the city in general. There is no comprehensive race/ethnicity data available for the cohort due to start primary school in September 2027.

We know that from the 2025 secondary application round 29.6% of all applications were from ethnically minoritised families and there is no ethnicity information for a further 5.4% of applicants. 21.8% of late school applications were submitted by ethnically minoritised families and for a further 43.7% there is no

ethnicity information. 78.2% of ethnically minoritised families who applied received their first preference school compared to 84.7% of white British families.

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

There has been an increased percentage of ethnically minoritised respondents who answered the equalities monitoring question in previous consultations about the council's admission arrangements from 19% in 2021 to 22.6% last year and 29% in this year's consultation.

In January 2025, a total of 1504 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 English as an Additional Language and Traveller Service (EALTS) 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. This service also supports Gypsy, Roma, Traveller communities with completing school applications and facilitate engagement with education. 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 17.7% of primary pupils and 14.6% of secondary 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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#### 6.5 Gender Identity and Sex:

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

Does your analysis indicate a disproportionate impact relating to <u>Gender Reassignment</u> ?	NO
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**6.7 Sexual Orientation:**

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

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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**6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):**

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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**6.10 Armed Forces Personnel, their families, and Veterans:**

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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**6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:**

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	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 English as an Additional Language and Traveller 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.

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

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.

It has been 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 <u>Carers</u> (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 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%

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 the admission arrangements 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 sibling link who live outside the catchment area resulting in 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 council's admission criteria 2 for exceptional circumstances could give priority for admission to young carers if there is independent supporting information demonstrating a compelling need for the child to be admitted to a particular school.

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.

349 consultees in last year's 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.

35 consultees to this year's consultation stated that they were a carer with 13 providing substantial unpaid care, 8 providing regular unpaid care and 9 providing occasional unpaid care and 5 preferred not to say. 233 responders did not answer the question.

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

<p><b>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</b></p> <p>Also consider our <a href="#">Corporate Parenting Responsibility</a> in connection to your activity.</p>	<p>NO</p>
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#### 6.14 Homelessness:

<p><b>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)</b></p>	<p>NO</p>
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#### 6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

<p><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></p>	<p>YES</p>
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#### If "YES", what are the positive and negative disproportionate impacts?

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

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 arrangements 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 arrangements 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. In the case of these arrangements 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 arrangements provide an enhanced opportunity to address their vulnerability by giving a prospect of being allocated the school of their choice.

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 this.

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.

## 6.16 Socio-economic Disadvantage:

<b>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)</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 schools proposed as having PAN changes are in different planning areas and serve different communities within in the city. From the January 25 school census: Rudyard Kipling Primary School has 27.2% of pupils within the 10% most deprived areas of Britain and 29.2% of pupils within the 20% most deprived areas of Britain. Downs Junior School has 5.1% of pupils within the 10% most deprived areas of Britain and 11.5% of pupils within the 20% most deprived areas of Britain.

Previous admission consultations and engagement exercises have highlighted that families experiencing socioeconomic disadvantage may have reduced capacity to engage in the consultation process or lobby for their interests compared to more affluent communities. This is compounded by practical concerns such as transportation costs and access to schools outside their immediate neighbourhood. Responses to this consultation need to be considered based on the content not just quantity of replies as some areas in the city due to the nature of the community will provide significantly more replies and in a variety of ways.

The key equity concerns raised included:

- House prices surrounding popular schools becoming inflated, potentially creating barriers for lower-income families.
- Some socio-economic groups being better able to lobby and provide cohesive community responses that may disproportionately influence decision making.
- Some communities may not be adequately represented in public meetings or consultation responses.
- Families who cannot afford to move close to oversubscribed schools could face reduced school choices.
- Concerns around areas being limited to access to lower-performing schools based on geography and socioeconomic factors.
- Financial implications for families, including transport costs, highlighted as potential barriers.

In the October 2025 census figures collected showed a total of 27.6% of pupils were in receipt of Free School Meals in the city.

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.

#### 6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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#### 6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

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

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
  - People experiencing homelessness
  - People on a low income and people living in the most deprived areas
  - People facing literacy, numeracy and/or digital barriers
  - Lone parents
  - People with experience of or living with addiction and/ or a substance use disorder (SUD)
  - Sex workers
  - Ex-offenders and people with unrelated convictions

- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

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

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

The proposed changes to secondary admission arrangements are intended to support opportunities for a greater number of children in the city to attend a school that meets their family needs.

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.

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)

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. Criteria 2 applications to be considered by a panel of professionals to ensure greater consistency in decision making which will be monitored and reviewed by the school admissions manager.

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. This can be achieved through the translation functionality of the councils website, the support of EALTS multilingual staff and the use of other interpreting services.

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. Implications of the changes to the council's admission arrangements for 2026 alongside the proposed changes for 2027 will need to be considered when the school allocation data for these cohorts is available in March/April and when the October school census data is available.

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 and 2027. For this to be feedback to school leaders as well as affected families, with regular review points planned to assess outcomes.

### 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 2027 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.	X

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

It is not unusual for a Local Authority area to amend and change city-wide admission arrangements and / or changes to catchment areas as demographics and circumstances of a local area changes. It is important that the council are sighted on and take consideration of the implications of those proposed changes, and the EIA plus other implications sections of the attached report will assist them to do so.

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 School Admissions Code requires admission authorities to ensure that oversubscription criteria are 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.

We do not have full and comprehensive information at this stage of the extent of the impact of changes made to the admission arrangements for 2026-27 however changes for 2027-28 are minimal in comparison. 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.

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.

The most significant impact will be on children seeking a place in a community secondary school who live outside a catchment area but have an older sibling attending the catchment school. Conversely, there may be children living in a catchment area who are unable to secure a catchment area school place if the catchment area does not catch due to the allocation of out of area siblings.

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 arrangements 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.

Concern was expressed that 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 29 January 2026

## 10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
<b>Responsible Lead Officer:</b>	Richard Barker, Head of Education	15/01/26
<b>Accountable Manager:</b>	Georgina Clarke-Green, Director of Education and Learning	

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

### EDI Review, Actions, and Approval:

#### Equality Impact Assessment sign-off

##### EIA Reference number assigned:

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

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

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

Signatory:	Name:	Date: DD-MMM-YY
<b>EDI Business Partner:</b>	Eric Page	28/12/2025
<b>EDI Manager:</b>		

**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:**

