

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 Team. 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 Officer 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 Closure of Middle Street Primary School
Directorate:	Families, Children and Wellbeing
Service:	Education and Learning
Team:	School Organisation
Is this a new or existing activity?	Existing activity under review – proposed change (closure of an existing school)
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – EIAs completed for other proposed school closures in Brighton & Hove have been used to inform this assessment.

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

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

3. About the activity

Briefly describe the purpose of the activity being assessed:

In response to a sustained fall in pupil numbers across Brighton & Hove and a number of local factors, the Council is proposing the closure of Middle Street Primary School. The school has experienced a significant and prolonged decline in pupil numbers which has resulted in a growing budget deficit that is not financially sustainable in the medium to long term. The primary school funding model is predominantly per-pupil, meaning that a school with low numbers cannot generate sufficient income to cover the costs of running a full primary school.

This EIA assesses the potential equality impacts of the proposed closure on: pupils currently attending the school; families of pupils; school staff; prospective pupils and their families; and the wider school community. The EIA has been informed by data from the school census, deprivation indices, SEND records, consultation responses, and engagement with school staff, families, and support services.

What are the desired outcomes of the activity?

To reduce surplus school places in the city in a way that is equitable and sustainable, ensuring the long-term financial viability of the remaining school estate and the quality of education available to all children in Brighton & Hove.

To ensure that every child affected by the closure is supported to secure an appropriate alternative school place that meets their individual needs, and that the transition process is managed with care and proportionate support for all groups, especially those with protected characteristics or intersecting vulnerabilities.

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

Primary school-aged children (aged 4–11) currently attending Middle Street Primary School, including children with Special Educational Needs and Disabilities (SEND) and those with Education, Health and Care Plans (EHCPs).

Families and parents/carers of pupils, including those from Black and Racially Minoritised communities, those for whom English is an additional language, migrant and refugee families, those with disabilities, and those from areas of socio-economic disadvantage.

School staff at risk of redundancy, including teaching and support staff.

Prospective pupils and families who had intended to apply for places at Middle Street Primary School.

The wider school community including community groups that use the school buildings and facilities.

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.

A public consultation on the proposed closure of Middle Street Primary School was conducted from 26th January to 9th March 2026. During this period, public meetings were held and an online consultation portal was made available. All stakeholders – including other admission authorities in the city, adjoining local authorities, the school's Interim Executive Board, families of children, and any other interested parties – were invited to respond.

Consultation responses inform this EIA. Where specific equality concerns were raised, these have been reflected in the relevant sections below.

Related EIAs completed for previous school closure proposals in Brighton & Hove have also been used to inform this assessment.

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	No
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	N/A
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes
Carers	Yes

Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	Yes
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	No
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?

Where data has not been collected (marked NO above), engagement with the school, and relevant support services has been used to identify potential impacts where possible. Gaps in data collection will be noted to the EDI team and considered in future monitoring arrangements. The transition support group will monitor outcomes for all groups throughout the transition period.

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

Monitoring of outcomes will be conducted through: the transition support group (meeting regularly until all pupils have settled in new schools); tracking of school placement outcomes by the School Admissions Team; SEN Team monitoring of EHCP compliance in receiving schools; HR monitoring of staff redeployment outcomes; and a post-transition review to be completed by October half-term.

The EDI team will be notified of this EIA, and it will be logged on the Directorate EIA Tracker for FIAP monitoring.

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

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.</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.

<p>The proposal will primarily affect primary school-aged children (4–11 years) currently attending Middle Street Primary School, as well as families who had intended to apply for places at the school.</p> <p>Children currently in Year 5 face a disproportionately significant impact. Should the school close at the end of the current academic year, they would need to move to a new primary school for Year 6 and then transition to secondary school in Year 7 – meaning three different schools within three consecutive years. This is an exceptional disruption at a formative stage of their education. Some pupils may have previously attended a school that has closed.</p> <p>Children in Reception and Key Stage 1 who have only recently settled into school life may find the prospect of moving to a new and unfamiliar setting particularly unsettling. Younger children may be less able to understand the reasons for the change and may be more affected by the loss of familiar adults, peers, and routines.</p> <p>Parents and carers of children who had expressed a preference for Middle Street for September 2026 entry will be affected, as these families will need to submit preferences for an alternative school.</p> <p>With regard to staff, those who are approaching retirement age may face greater difficulty in securing alternative employment, particularly those on the Upper Pay Scale whose salary protection may be a barrier when competing with less experienced candidates for available posts. Some staff may have previously worked in a school that has closed.</p> <p>The age profile of respondents to the initial consultation was broadly consistent with the profile of parents of primary-aged children, with the majority aged between 30 and 49.</p> <p>Mitigation: The transition support group will identify all pupils requiring targeted support during the transition period, with particular attention to Year 5 children and those in early years. The Council’s Vulnerability Index tool, adapted for primary-to-primary transition, will be used to develop individual action plans where needed. The School Admissions Team will proactively contact all families who have expressed a preference for Middle Street Primary School to ensure they are aware of the proposal and can submit alternative preferences. Families who are unable to apply online will be supported by the admissions team directly. The Council will ensure a school place is available for every child in every year group.</p> <p>Receiving schools to be made aware of impact of transition on these groups of children so appropriate support can be provided.</p>

6.2 Disability:

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

Middle Street Primary School serves a number of pupils with Special Educational Needs and Disabilities (SEND). As at the most recent school census, 8 pupils have an Education, Health and Care Plan (EHCP), representing approximately 11% of the school roll. A further number of pupils receive SEN Support without an EHCP. The school also has access to an Education Mental Health Practitioner and the Schools Mental Health Service.

Families responding to the consultation raised concerns that the small size and nurturing environment of Middle Street is particularly well-suited to children with SEND and additional needs. The prospect of transitioning to a larger school is a significant source of anxiety for many of these families, who fear that the individual attention and support their children currently receive would not be replicated elsewhere.

Neurodiverse pupils – including those with autism, ADHD, and anxiety-related conditions – may find any change of school environment disproportionately challenging. Disruption to established routines, familiar staff, and known peer groups can have a pronounced negative impact on the wellbeing, behaviour, and academic progress of these children.

Parents or carers with a disability may face additional practical barriers in engaging with the admissions process or in managing a change of school journey for their child. Data from the survey identified that 14% identified as having a health condition, illness or disability

Data on the disability status of parents and carers is not routinely collected; identifying details of staff disabilities relies on self-disclosure into the Council’s management information system and is treated as sensitive personal data. During the staff consultation process, 1:1 discussions will be available to all staff, and individual circumstances including disability will be considered sensitively.

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).

All children with EHCPs will be supported by the SEN Team and Brighton & Hove Inclusion Support Services (BHISS) to transition to an appropriate new school. The Council will ensure that the provision specified in each child’s EHCP can be met at the receiving school, including any physical accessibility, adaptability, or specialist resource requirements. All children with EHCPs will have an annual review. Any children currently undergoing an EHC needs assessment will have their assessment progressed as normal.

Pupil premium and SEND-related funding will follow pupils to their new school. All Brighton & Hove maintained mainstream schools are expected to be able to meet the needs of children without EHCPs, with appropriate additional support or resources where necessary.

The transition support group will maintain specific oversight of pupils with SEND and will develop bespoke transition plans for those identified as most at risk. BHISS and the Schools Mental Health Service will provide targeted support to identified pupils before, during, and after any transition.

For staff with disabilities, the Council’s HR service will ensure that reasonable adjustments are made throughout the staff consultation and redundancy process. Individual circumstances will be discussed sensitively in 1:1 meetings.

Families with disabled children, or parents/carers who themselves have a disability, who may face difficulties travelling to a new school, will be considered under the Council’s home-to-school transport policy and may be eligible to apply for transport assistance.

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.

As at the January 2026 school census, 48% of pupils identified as an ethnicity other than White British. Across Brighton & Hove, 33% of pupils at primary phase identified as an ethnicity other than White British in January 2026, compared to 38% nationally in 2025.

Evidence from previous admissions cycles across the city indicates that Black and Racially Minoritised families are more likely to apply for school places late, which significantly reduces their chances of being offered a place at a preferred school.

Families from BRM backgrounds who have experienced racism – including those who have sought asylum or fled conflict – may find the process of establishing themselves in a new school community particularly daunting. Concerns were raised through the consultation about whether receiving schools would be adequately equipped and culturally responsive to meet the needs of these families.

Mitigation:

Proactive support will be offered to ensure all families can understand the need and be supported to apply for a school place by Easter break to ensure they are allocated new school places for September.

The Council will communicate clearly to all receiving headteachers its expectations regarding the welcoming, equitable, and culturally responsive treatment of all displaced pupils, with specific reference to those from BRM and migrant/refugee backgrounds. The Council’s Anti-Racist Education Strategy will be promoted to receiving schools, ensuring they have the training and support to build inclusive, welcoming communities. Appropriate cultural provisions – including multi-faith spaces, dietary accommodation, and culturally relevant curriculum content – will be expected of receiving schools. Families who experience discrimination will be signposted to relevant support and advocacy organisations.

All schools are expected to deliver a rich curriculum suitable to all pupils who attend the school. Schools are expected to celebrate the experiences of families in the city and from other areas. We expect the schools to demonstrate understanding of lived experiences of migrants and asylum seekers, and we are committed to supporting schools in further developing their understanding and making reasonable adjustments to ensure curriculum is accessible to all.

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.

Middle Street Primary School is a non-faith, secular community school. A number of families will have specifically selected the school because of its secular ethos and the absence of a religious character or faith-based curriculum. These families will need to be supported to identify suitable secular alternatives should the school close.

The closure of Middle Street Primary School would reduce the number of secular places available in the local area.

Families from minority faith backgrounds – including Muslim, Hindu, Jewish, and other faith communities – who have had their cultural, dietary, and religious observance requirements accommodated at Middle Street Primary School will require assurance that these needs will continue to be met at receiving schools. Families whose faith requires, for example, specific dietary provision, prayer space, or time for religious observance will need to feel confident that any receiving school is responsive to their needs.

No specific data is available on the religion or beliefs of pupils, parents, or staff at Middle Street Primary School. During the consultation, a proportion of respondents identified as having no religious belief; others identified as Christian or from other faith backgrounds.

Mitigation:

Proactive support will be offered to ensure all families can understand the need and be supported to apply for a school place by Easter break to ensure they are allocated new school places for September.

The Council will ensure that sufficient secular school places are available within a reasonable distance of Middle Street Primary School for families who require a non-faith education. The Council will communicate to receiving schools the expectation that all children are welcomed and that appropriate provision is made for the cultural and religious needs of incoming families, including multi-faith spaces and dietary accommodation where required. Timetabling of any closure-related processes and key deadlines will take account of significant religious observance dates to ensure families are not disadvantaged in their ability to engage with the process.

6.5 Gender Identity and Sex:

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

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

There are no single sex maintained primary schools in Brighton & Hove, and admission arrangements do not take the sex or gender identity of a child into account. As at the most recent census, Middle Street Primary School had approximately equal numbers of male and female pupils.

The majority of roles at Middle Street Primary School that are at risk of redundancy are held by women, consistent with the wider pattern of female-dominated employment in primary education. The financial and emotional impact of job loss – particularly in the context of cost-of-living pressures – may therefore fall disproportionately on women. Barriers to re-employment, including caring responsibilities and the prevalence of part-time and term-time-only roles in primary education, may mean that some female staff find it harder to secure equivalent employment.

Women are more likely to hold primary childcare responsibilities within their households. If closure results in children attending schools at a greater distance from home, this may impose additional travel burdens on women, which may in turn affect their employment options or ability to manage other caring responsibilities. This concern was raised directly by a number of respondents during the consultation, with women making up the significant majority of those who responded.

There may be children at Middle Street Primary School who identify as non-binary or who have gender-related support needs. The transition to a new school community may present particular challenges for these children in terms of having to re-establish their identity, trusted relationships, and any bespoke support they currently receive.

Mitigation: The Council will ensure that appropriate support pathways are in place for any children or young people with gender-related needs. Signposting to voluntary sector organisations will be available.

The HR service will ensure that all staff, including those with caring responsibilities, are supported throughout the redundancy process and that flexible working requests are considered sympathetically in any redeployment context. Home-to-school transport assistance will be provided in line with the Council's policy.

6.6 Gender Reassignment:

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

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

No specific disproportionate impacts have been identified for this group. Data on gender reassignment is not routinely collected and relies on self-disclosure.

The Council will ensure that any children or young people who are transitioning or questioning their gender are supported sensitively in any school move. If any individual indicates a need for support in this regard, bespoke assistance will be provided.

The transition to a new school setting could present risks for transgender or gender-questioning children and young people, particularly if they have established trusted, supportive relationships at Middle Street Primary School that have taken considerable time and effort to build. Starting

afresh in a new school community may expose these children to uncertainty or, in the worst cases, to bullying or discrimination.

Mitigation: All Brighton & Hove schools are expected to have appropriate policies and practices in place to support gender-diverse children and young people. If any individual pupils or families identify gender reassignment as a specific consideration in their school move, the Council will ensure bespoke and compassionate support is provided. Signposting to specialist support organisations will be made available to all families on request.

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.

No specific disproportionate impacts have been identified for this group based on available data. Sexual orientation data is not routinely collected for pupils, parents, or carers, and relies on self-disclosure.

The Council recognises that discrimination based on sexual orientation remains prevalent and that LGBTQ+ families may face specific challenges in ensuring their children are welcomed and affirmed in a new school community. Brighton & Hove has a significant LGBTQ+ community, and some families may have specifically valued the inclusive ethos of Middle Street Primary School.

Redeployment decisions for school staff will not take sexual orientation into account. The Council expects all receiving schools to maintain an explicitly inclusive and anti-discriminatory ethos with regard to sexual orientation.

Mitigation: Voluntary sector organisations providing support to children and families around sexual orientation – including those who support LGBTQ+ parents and their children – are available in the city and will be signposted as appropriate. Any individual concerns raised will be addressed sensitively and bespoke support arranged where needed

6.8 Marriage and Civil Partnership:

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

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

No specific disproportionate impacts have been identified for this group. Data on marital or civil partnership status is not routinely collected, and this issue was not raised as a specific concern through the consultation process.

The Council recognises that single-parent households may face additional pressures during the transition, particularly in relation to managing school journeys, engaging with the admissions process, and arranging childcare. These pressures are considered further under the socio-economic disadvantage section of this assessment.

The Council is mindful that families in same-sex partnerships may have specific concerns about the ethos of any receiving school. If any such concerns are raised, the Council will signpost appropriate support.

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.

The Council does not hold data on the pregnancy or maternity status of parents or carers of pupils at Middle Street Primary School. However, it is recognised that some families will include parents who are currently pregnant or on maternity or paternity leave, and that these individuals may have reduced capacity to engage with the consultation and admissions processes due to the demands of caring for a new or very young child.

Families with pre-school children who are siblings of current pupils may face particular difficulties if an older child needs to travel further to a new school. Concerns about travelling to a new school with a pre-school child or while pregnant were raised during the consultation process.

Prospective families – those expecting a child who had intended to apply for Reception places at Middle Street Primary School – will need to reconsider their school preferences and will need early, proactive communication about the proposal.

Staff who are on maternity or paternity leave at the time of the redundancy process will be included in the consultation and their rights will be fully protected in line with employment law. The Council will ensure that every such situation is handled compassionately and that bespoke support is available where needed. HR advice will be provided, and a risk assessment tool is available to support pregnant staff.

Mitigation: The School Admissions Team will work proactively with families where pregnancy or maternity is identified as a factor in their ability to engage with the process. The Council will ensure sufficient places are available within a reasonable distance for families where a pregnant adult or an adult on maternity leave would face difficulty accessing a more distant school. Receiving schools will be asked to accommodate the practical needs of such families wherever possible.

HR advice can be provided for pregnant school staff.

The risk assessment tool is available to support pregnant staff.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NOT APPLICABLE
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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>No specific disproportionate impacts have been identified for armed forces personnel, their families, or veterans in connection with this proposal. There is no evidence that Middle Street Primary School serves a disproportionately high number of armed forces families.</p> <p>The Council acknowledges its obligations under the Armed Forces Covenant and will ensure that any armed forces families who come forward during the transition process are supported appropriately, including through the school admissions process.</p>

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	No
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If “YES”, what are the positive and negative disproportionate impacts?

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

<p>Middle Street Primary School is not known to serve a number of migrant, asylum-seeking, and refugee families</p> <p>The Council is aware that language barriers may make it substantially more difficult for these families to understand the consultation process, the implications of the proposal, the steps required to apply for an alternative school place, and the timescales involved. Based on evidence from similar school closure processes in Brighton & Hove, families with English as an additional language (EAL) are disproportionately more likely to submit late applications for school places, which reduces their chances of being offered a preferred school.</p> <p>Families from migrant and refugee backgrounds may also hold well-founded fears or anxieties about engaging with statutory processes, particularly those with insecure immigration status or those who have had negative experiences of government or authority in their countries of origin. These concerns may deter engagement with the consultation or admissions process entirely.</p> <p>Children from migrant and refugee backgrounds who have experienced multiple disruptions to their schooling – whether in their country of origin or since arriving in the UK – may be particularly adversely affected by another unwanted school change. The impact of this disruption on their academic progress, sense of security, and emotional wellbeing could be significant.</p> <p>Mitigation: proactive and sustained outreach will be provided to all migrant, refugee, and EAL families throughout the closure process and admissions/transition periods. Interpreting support will be made available on request at all meetings and appointments. The Council will write to all receiving headteachers setting out its clear expectation that displaced pupils – including those</p>

from migrant and refugee backgrounds – are welcomed with sensitivity, understanding, and appropriate support. The transition support group will include specific oversight of this group of families.

6.12 [Carers](#):

<p>Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).</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.

Parents and carers who are themselves disabled, or who care for other family members (such as elderly parents, or disabled partners or other children) in addition to their school-age children, may face additional practical challenges if school journeys become longer or more complex as a result of closure.

Young carers – children who have caring responsibilities for a family member – may also be present in the school community. These children may already be managing significant additional pressures, and the disruption of a school closure could have a disproportionate impact on their attendance, wellbeing, and academic progress at a time when stability is particularly important.

The demands of the consultation and admissions process may be disproportionately burdensome for carers who have limited time and capacity due to their caring responsibilities.

Mitigation: The admissions team and school will be asked to identify any families where caring responsibilities are a specific factor in their ability to engage with the process or to manage a change of school. The Council will ensure that home-to-school transport assistance is considered for eligible families, and that the admissions process is made as accessible as possible. Any young carers identified will be referred to appropriate support services.

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

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</p> <p>Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	<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.

Brighton & Hove City Council has formally adopted Children in Care and Care Experienced Young People as a protected characteristic, reflecting its Corporate Parenting responsibilities. The Council has a demonstrable and collective commitment to ensuring that children and young people with care experience are able to access the same educational opportunities as their

Nationally, children in care and those previously looked after are significantly more likely to have SEND, with approximately 66% having an identified need and 35% having an EHCP – compared to 12% of the general population. Around 50% of children in care have a diagnosable mental health condition. These statistics highlight the particular vulnerability of this group to the disruptions and anxieties associated with a school closure.

Care-experienced children are likely to have experienced previous trauma, loss, and transitions. The process of school closure – and the uncertainty it generates – may reactivate these negative experiences and feelings, even for children who are not currently in care, but who have care experience. It can equally be expected that parents who were themselves in care may re-experience the trauma associated with earlier periods of their lives.

Mitigation: Children in care and previously Looked After Children hold the highest admissions priority in Brighton & Hove’s school allocation process. The Virtual School has a specific statutory responsibility to support children in care and those known to a social worker and will provide dedicated support to any pupils displaced from Middle Street Primary School. The transition support group will include specific planning for children in care and those with social worker involvement, with bespoke individual action plans developed as appropriate. The Council’s Corporate Parenting responsibilities will be central to the oversight of this group throughout the transition.

6.14 Homelessness:

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

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

Families in temporary accommodation or experiencing housing instability are likely to face additional vulnerability during a school closure process. These families may have unstable or frequently changing home addresses, which can create challenges in the admissions process where proximity to a school is a key allocation criterion. They may also have limited capacity to engage with multi-stage consultation and admissions processes.

Brighton & Hove has a significant and well-documented homelessness challenge. Families placed in temporary accommodation may not be close to their preferred schools and may already be travelling longer distances. A school closure that requires an additional school move could compound the instability these families are already experiencing.

Children experiencing homelessness or housing instability are more likely to have multiple adverse childhood experiences and may be at heightened risk of poor educational outcomes if their schooling is additionally disrupted.

Mitigation: The School Admissions Team will work sensitively with families in temporary or insecure accommodation to support them through the admissions process. The Council will ensure that sufficient surplus places remain available in the local planning area so that late-applying or mid-year families can access a local school. Homeless families will be signposted to the Council’s housing support services and other relevant organisations as appropriate.

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

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

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

<p>The school may currently represent a place of safety, routine, and trusted adult relationships for children and families affected by domestic abuse or other forms of exploitation and violence. The loss of this stability through closure could have a significant impact on these children’s sense of security and on the continuity of safeguarding support.</p> <p>Families affected by domestic abuse may have made deliberate choices about which school to attend based on proximity to a refuge or safe address, or to avoid areas where an abusive partner might encounter them. A school closure that requires a change of school – potentially to a less familiar area – could create specific safety concerns for these families.</p> <p>Children who have experienced domestic abuse, exploitation, or other adverse childhood experiences (ACEs) are more likely to exhibit emotional and behavioural difficulties and may be particularly sensitive to changes in their environment and trusted relationships. Further disruption to their schooling could have a compounding negative effect on their progress and wellbeing.</p> <p>Mitigation: The school and partner services will be asked to identify any families known to be in vulnerable situations so that they can receive targeted and sensitive support throughout the transition. The Council’s safeguarding obligations will be fully maintained and will be a central consideration of the transition support group. Families will be signposted to domestic abuse support services and other relevant organisations where appropriate. Any specific safety considerations related to school placement for individual families will be handled with the utmost sensitivity and in close liaison with Children’s Social Work.</p>

6.16 Socio-economic Disadvantage:

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

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

<p>A significant proportion of pupils are eligible for Free School Meals (FSM), which is a key indicator of economic disadvantage.</p> <p>Families from lower socio-economic backgrounds may face greater barriers in engaging with the consultation and admissions process, including limited or no access to digital devices or the</p>
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internet, reduced capacity due to working multiple jobs or irregular hours, and lower levels of familiarity or confidence with formal council processes.

The school admissions system in Brighton & Hove uses proximity as a key criterion for oversubscribed schools. House prices surrounding popular schools are often inflated due to demand, meaning families from lower socio-economic backgrounds are systematically less able to live close to oversubscribed schools and therefore less likely to receive an offer at a preferred school. This structural inequality is likely to disadvantage Middle Street Primary School families disproportionately in seeking alternative placements.

Families on lower incomes are also less able to manage the additional costs associated with a longer school journey, such as bus fares or the cost of additional childcare if drop-off and collection times change. Some families without access to a car may face particular difficulties travelling to a school outside their immediate neighbourhood.

The closure of Middle Street Primary School may also affect community cohesion in the local area, as the school may currently serve as a focal point for community activities and support that low-income families rely upon.

Mitigation: Pupil premium and all other per-pupil funding attached to eligible pupils will follow those children to their new schools. The Council will ensure that receiving schools receive full information about the socio-economic profile of incoming pupils and their individual entitlements. Transport assistance will be provided to eligible families in line with the Council’s home-to-school transport policy. The School Admissions Team will proactively support families from deprived backgrounds who may need additional help navigating the admissions process, including by providing non-digital routes to application and additional in-person support. The Council will work to ensure that sufficient places remain available in local schools so that families without transport do not need to travel unreasonable distances.

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.

The proposed closure of Middle Street Primary School engages a number of human rights considerations under the Human Rights Act 1998 and the European Convention on Human Rights (ECHR).

Article 2 of Protocol 1 of the ECHR – the right to education – is the most directly relevant provision. The Council is satisfied that sufficient alternative primary school places exist within a reasonable distance of Middle Street Primary School to ensure that all affected pupils can be offered an appropriate alternative school place, thereby ensuring that the right to education is upheld for every child. The Central City planning area currently has surplus capacity, and this is projected to remain in coming years.

Article 8 of the ECHR – the right to respect for private and family life – is also engaged. The closure of a school inevitably disrupts established routines, friendships, trusted adult relationships, and community networks that form part of family and social life. The Council considers this disruption to be a proportionate consequence of the legitimate aim of maintaining

a financially sustainable, high-quality school estate across the city. The mitigating measures described throughout this EIA are designed to minimise the extent of this disruption.

Article 14 of the ECHR – the prohibition on discrimination – is relevant when read alongside the other Convention rights. The Council is committed to ensuring that the closure process does not give rise to unlawful discriminatory treatment of any group with protected characteristics, and that mitigating actions are proportionate and effective in addressing the differential impacts identified in this assessment.

The Council has fulfilled its obligations under the Public Sector Equality Duty in section 149 of the Equality Act 2010 by completing this Equality Impact Assessment and by considering the equality impacts of the proposal in its decision-making. The proposal has been subject to both a public consultation and a statutory representation period, ensuring that affected stakeholders have had a meaningful opportunity to contribute to the process.

Mitigation: The Council will keep this EIA under review throughout the statutory process and if the decision is made to close, throughout the transition process and will take further action to address any human rights concerns that are identified. Legal advice has been sought on the human rights implications of the proposal. The Council is committed to the mitigation actions identified throughout this assessment and will monitor their effectiveness.

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

Middle Street Primary School serves a community with multiple intersecting vulnerabilities. A number of families face more than one of the equality impacts identified in this assessment. In particular, families who are from Black and Racially Minoritised backgrounds AND have English as an additional language, or who are migrants/refugees AND have children with SEND, or who are from areas of socio-economic deprivation AND are single parents, face compounded challenges that are greater than the sum of their individual parts.

The consultation period may have placed demands on all families, and those with multiple intersecting vulnerabilities – including those with limited literacy or digital access, those who are isolated due to language barriers, and those managing trauma and instability – may have found it harder to engage and may have under-responded relative to their numbers.

The transition support group has been established to take a holistic, intersectional view of the needs of affected pupils and families. The group includes representation from BHISS, the SEN Team, School Admissions, and the Schools Mental Health Service. Individual action plans will be developed for children identified as having complex or intersecting needs, using the Council's Vulnerability Index tool adapted for primary-to-primary transition.

Additional funding has been secured within the local authority to support the work of these services during the transition period. The Council is committed to ensuring that no group is further disadvantaged by the closure process and that the most vulnerable children and families receive the most intensive support.

The Council recognises that the lived experience of many families at Middle Street Primary School means that the loss of a familiar, trusted school community may be felt very deeply. This will be acknowledged throughout the process and will inform the way in which the transition is managed.

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)

SMART Action 1: Operate a transition support group to provide strategic and operational oversight of all pupil transitions from Middle Street Primary School, ensuring all vulnerable groups are identified, supported, and placed in appropriate schools by September 2026.

- Convene the transition support group to meet at least fortnightly until all transitions are completed.
- Develop individual transition action plans for all pupils identified as vulnerable using the Council's Vulnerability Index tool.
- Ensure representation on the Board from BHISS, SEN Team, School Admissions, Schools Mental Health Service, and the Virtual School.
- Conduct a post-transition review by November 2026 to assess outcomes for all groups with protected characteristics.

SMART Action 2: Ensure all families of children at Middle Street Primary School receive accessible, proactive, and where necessary translated information and support to enable them to secure an appropriate alternative school place by the published deadline, with particular focus on families from Black and Racially Minoritised backgrounds, those with EAL, migrants and refugees, and those with children with SEND.

- EALTS will provide direct outreach and casework support to all EAL and migrant/refugee families throughout the statutory notice, and admissions process.
- Provide interpreting support on request at all public meetings and one-to-one appointments.
- Ensure the School Admissions Team proactively contacts all families who have not yet applied for an alternative place by Spring Term.
- Ensure all children with EHCPs are supported by the SEN Team to secure a place at an appropriate school and that receiving schools can meet their identified provision.
- Provide HR support to all staff at risk of redundancy, with bespoke arrangements for staff with disabilities, staff on maternity/paternity leave, and staff approaching retirement age.
- Communicate the Council's expectations regarding welcoming and equitable treatment of displaced pupils to all Brighton & Hove headteachers, with specific reference to pupils from BRM communities, those with SEND, and those who have experienced trauma or displacement.

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.

Actions identified in this EIA will be transferred to the Education and Learning Service Plan and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Director quarterly and to the EDI team as part of FIAP performance reporting and auditing. The EDI team will be notified, and this EIA will be logged on the Directorate EIA Tracker.

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 proposed closure of Middle Street Primary School will have disproportionate negative impacts on a number of groups with protected characteristics, including children with SEND, Black and Racially Minoritised families, families with English as an additional language, migrant and refugee families, women (as both primary carers and the majority of the at-risk workforce), and families from areas of socio-economic deprivation. Children currently in Year 5 face a particular and exceptional disruption, facing the prospect of three different schools in three consecutive years.

These impacts cannot be entirely eliminated. However, having considered all available options, the Council is satisfied that they are capable of substantial mitigation through the comprehensive programme of transition support, proactive outreach, and individual action planning described in this EIA. The school's financial position is not sustainable and there is no viable alternative to closure that would not require ongoing exceptional and open-ended financial support from the Council. The decision to proceed is therefore considered proportionate to the legitimate aim of maintaining a financially sustainable and high-quality school estate across Brighton & Hove.

The Council is committed to the mitigating actions set out in this EIA and to reviewing their effectiveness through the transition support group and post-transition review process.

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

The Equality Impact Assessment for the proposed closure of Middle Street Primary School has identified disproportionate impacts across multiple protected characteristics. The groups most significantly affected are: children with Special Educational Needs and Disabilities (SEND); pupils and families from Black and Racially Minoritised communities; families with English as an additional language; migrant, asylum-seeking, and refugee families; women (as both the majority of the school workforce and as primary carers); children in care and care-experienced young people; families from socio-economically deprived areas; and pupils currently in Year 5 who face the disruption of three school changes in three years.

The Council considers that these impacts, while serious, can be substantially mitigated through the comprehensive programme of transition support described in this EIA, including the transition support group, individual pupil action plans, EALTS support, targeted HR support for staff, and proactive communication with receiving schools.

The proposal is considered proportionate to the objective of ensuring a financially sustainable and high-quality school estate across the city. The Central City planning area has surplus places and the school's financial position is not sustainable. Councillors are asked to have due regard to the equality impacts identified in this assessment and the mitigating actions proposed when reaching their decision.

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 EIA will be published on the Council's website in accordance with the Council's standard EIA publication process.

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Richard Barker – Head of Education	11-03-2026
Accountable Manager:	Georgina Clarke-Green - Director of Education & Learning	11-03-2026

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 Officer 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 approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:		
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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