

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:	Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029
Directorate:	Families, Children and Wellbeing
Service:	Education and Learning
Team:	SEND Statutory Service/School Organisation
Is this a new or existing activity?	New strategic activity. The SEND Sufficiency Plan 2026-2029 is a strategy setting out how the Council will discharge its statutory duty under Section 14 of the Education Act 1996 to secure sufficient school places for children and young people with SEND. It builds on the SEND Strategy 2021-2026, in which SEND sufficiency was identified as one of the six key priorities.

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	The Plan is a strategic enabling document. Each individual provision proposal that flows from it will be the subject of its own statutory process and its own individual Equality Impact Assessment in due course.
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2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The SEND Sufficiency Plan 2026–2029 sets out the city's strategy for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years, and identifies a programme of new and expanded provision to address known and projected gaps in capacity.

Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2025, 24% of pupils in the city (7,263) were identified as having SEND, compared with the national average of 18%. The number of children and young people with an Education, Health and Care Plan (EHCP) is projected to rise from 2,886 in May 2025 to 4,427 by 2032, an increase of 50%. Autism and Social, Emotional and Mental Health (SEMH) needs continue to be the largest and fastest-growing categories of need.

The Plan responds by setting out a phased programme of provision, the headline elements of which are: three new Autism Resource Units (ARUs) of 20 places each at Patcham High School, Cardinal Newman Catholic School and Stanford Junior School; a further expansion of Inclusion Intervention Spaces (IIS) in primary schools (an additional 10 places in 2026/27); and changes underway at the Central Hub Brighton (CHB), the city's specialist alternative provision for children with SEMH needs, including a new leadership model and proposed site changes for 2026/2027.

The Plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform, including the SEND and AP Improvement Plan (2023), the Schools White Paper 'Every Child Achieving and Thriving' (2025) and the parallel SEND Reform consultation 'Putting Children and Young People First' (2025). It is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance.

The SEND Sufficiency Plan is not itself a statutory document. It sets out the Council's strategic approach to discharging its Section 14 duty and informs the prioritisation and sequencing of individual provision proposals. Each individual proposal that requires a statutory process — for example a prescribed alteration under the Education and Inspections Act 2006 — will be the

subject of separate consultation, statutory notice, decision-making and its own Equality Impact Assessment.

What are the desired outcomes of the activity?

The desired outcome of the SEND Sufficiency Plan 2026–2029 is that children and young people with SEND in Brighton & Hove can access sufficient, appropriate and high-quality education provision that meets their needs as close to home as possible.

The Plan is intended to increase local specialist capacity in a planned way, reduce reliance on costly out-of-area placements, and improve the ability of mainstream schools and specialist settings to respond to rising demand, particularly in relation to autism and SEMH needs.

It also aims to support earlier intervention, greater inclusion and better transition pathways for children and young people with SEND, so that more pupils are able to learn in the right provision at the right time, with improved consistency of support and improved outcomes for families.

At a strategic level, the Plan is intended to provide a clear framework for prioritising future provision proposals and investment decisions, ensuring that the Council can meet its statutory sufficiency duties in a way that advances equality of opportunity and supports an inclusive education system across the city.

These outcomes directly support the three aims of the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010: (1) eliminating unlawful discrimination, harassment and victimisation — by reducing structural barriers to appropriate provision and ensuring all children with SEND can access education without being disadvantaged by their disability or other protected characteristics; (2) advancing equality of opportunity — by creating sufficient local specialist provision, improving early identification, and strengthening inclusive practice so that children with SEND have equitable access to appropriate education alongside their peers; and (3) fostering good relations — by promoting inclusive schooling, building understanding of diverse needs across school communities, and supporting the integration of specialist provision within mainstream settings.

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

The groups most directly affected by the Plan are children and young people with SEND (in particular those with autism and SEMH needs) and their families; the school communities of the schools identified as hosts for new provision; and staff working in specialist and alternative provision, including at the Central Hub Brighton. The Plan also affects the wider school system, given the move towards SEND school groupings and a more inclusive mainstream offer.

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 draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises school and provision leaders, Council officers and Parent Carer Forum representation, and has supported the development of the Plan throughout.
- A full data refresh was commissioned in January 2025 to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- Particular attention has been given to ensuring that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. This has included targeted consideration of Black, Asian and Minority Ethnic (BAME) and Black and Racialised Minority (BRM) parent carers with children who have SEND; families where English is an Additional Language (EAL); and children and families living in temporary accommodation, who can face heightened barriers to engagement and to maintaining continuity of specialist provision. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), and other recognised representative groups.
- Engagement with PaCC confirmed that parent carers value increased local provision and the reduction in out-of-area placements as a priority, and raised the importance of consistent transition support, clear communication about how new provision will be accessed, and the need for schools to have the skills and resources to support children before EHCP thresholds are reached.
- Reaching out to young people, through various other recognised representative groups reinforced the importance of proximity to home, peer relationships and consistency of staffing in any new provision. These insights have directly informed the Plan's emphasis on phased and locally-rooted provision, and will be incorporated into the project-level EIAs for each individual proposal.
- As the Plan is a strategic framework, it does not itself carry a single statutory consultation. Each individual provision proposal arising from the Plan — including each of the three proposed Autism Resource Units — will be the subject of its own formal public consultation and statutory notice, and the equalities feedback gathered through those consultations will inform the project-level EIA for each proposal. This EIA will be reviewed and updated as that engagement takes place.

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
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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	NO
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)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
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)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	Not applicable

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?

For characteristics currently recorded as "NO" in the table above data is either not routinely collected for the pupil population or is not directly relevant to the strategic nature of this Plan.

The Council will take the following steps to improve data coverage where practicable.

For individual provision proposals arising from this Plan, project-level EIAs will identify relevant data gaps and set out how those gaps will be addressed through local engagement and targeted outreach.

Where characteristics such as EAL status, refugee or asylum-seeker status, or temporary accommodation are relevant to access to SEND provision, the Council will work with relevant services (including the Virtual School Head) to understand and address barriers at the project level.

Feedback from consultation with recognised representative groups will continue to be used as qualitative evidence to supplement formal data, including on characteristics that are harder to capture quantitatively.

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

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations

- Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
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If "YES", what are the positive and negative disproportionate impacts?

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

The Plan affects children and young people with SEND across the full 0–25 age range. The provision programme is deliberately phased across age groups: primary (Key Stage 2) autism provision through the proposed Stanford Junior ARU; secondary autism provision through the proposed Patcham High and Cardinal Newman ARUs; early intervention through the expansion of Inclusion Intervention Spaces in primary schools; and continued specialist alternative provision for SEMH needs through the Central Hub Brighton, including the Treehouse (primary) and the Connected Hub (Year 11).

Demand data shows growth in need across all phases, with particular pressure at transition points and a decline in Reception transfers to special schools (from a peak of 22 in 2023 to 17 in 2025) reflecting capacity pressure rather than reduced demand. By planning provision across the age range, the Plan is intended to address need at the point and phase at which it arises.

The impact is assessed as positive, in that the Plan is designed to increase age-appropriate local provision. No adverse age-related impact has been identified at the strategic level.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Phasing of provision will continue to be informed by the annual data refresh, so that capacity is created in the right phase at the right time.

Transition planning between phases (Early Years to primary, primary to secondary, and Key Stage 4 to post-16) will be a specific consideration in the design of each new provision and will be addressed in the project-level EIA for each proposal.

Particular attention will be given to the transition for young people aged 16 and above, who are at known risk of falling out of the SEND system at the point of reaching adulthood. The Plan recognises that the EHCP framework extends to age 25, and the Council is committed to ensuring that young people with SEND are not “lost” at the 16+ transition.

The annual data refresh will track the destination and provision status of young people with EHCPs beyond Key Stage 4, and the SEN Sufficiency Workstream will consider whether current post-16 and further education capacity is adequate to meet projected demand. Where gaps are identified, they will be escalated to the relevant commissioning leads and addressed in future iterations of the Plan.

6.2 Disability:

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

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

Disability and SEND are at the very heart of this Plan; children and young people with SEND are the principal intended beneficiaries. In January 2025, 24% of pupils in the city were identified as having SEND, against a national average of 18%, and 5.8% held an EHCP (national average 5.3%). The number of EHCPs is projected to rise by 50% to 2032.

Without further action, the Council would be unable to meet its Section 14 duty to provide sufficient school places for children with SEND, and reliance on out-of-area and independent/non-maintained provision — which has risen by approximately £1 million over the last three years — would continue to grow. The Plan is intended to reverse this by creating local, appropriate provision and enabling more children with disabilities to be educated close to home.

The impact on disabled children and young people is therefore assessed as strongly positive. The principal risks are implementation risks — that new provision is not designed to be fully accessible, or that transition into new provision is poorly managed — rather than risks inherent in the strategy itself.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Each new resource base and provision will be designed to meet the needs of the children it is intended to serve, with accessibility, sensory and SEN design requirements built in from the outset and assessed through the project-level EIA and the statutory process for each proposal.

The Council will continue to apply the SEND Code of Practice and the Principles of Belonging, and will ensure that the expansion of provision does not inadvertently create a two-tier offer; the move towards Ordinarily Available Inclusive Practice (OAIP) is intended to strengthen the mainstream offer alongside specialist provision.

Home to School Transport assistance will continue to be available to eligible children, and the increase in local provision is itself expected to reduce the need for long-distance travel for many disabled children.

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).

As a strategic plan concerning SEND provision, inclusive adjustment considerations are embedded throughout the Plan and will be operationalised at the project level.

The following adjustments apply at the strategic level:

- Physical accessibility — all new and expanded provision will be required to meet current accessibility standards, including for wheelchair users, those with mobility difficulties, and children with sensory impairments. Accessibility requirements will be assessed as part of the capital design process for each new provision and addressed in the project-level EIA.
- Communication and information — all consultation and information materials relating to this Plan and individual proposals will be available in accessible formats, including Easy Read, large print and digital accessible formats, and in community languages with translation and interpreting on request.
- Neurodivergent and sensory needs — the design of new Autism Resource Units and Inclusion Intervention Spaces will specifically incorporate SEN design standards, including appropriate sensory environments, clear circulation routes and quiet spaces, to ensure the physical environment is accessible and supportive for neurodivergent children.
- D/deaf and hearing-impaired children — the needs of D/deaf or hearing-impaired children will be considered in the design of new provision, and specialist support will continue to be available in conjunction with the Sensory and Physical Support Service.
- Children with non-visible disabilities — the Plan's emphasis on strengthening the mainstream offer through Ordinarily Available Inclusive Practice (OAIP) is specifically intended to improve the identification of and support for children whose needs are not immediately visible and who may not yet have an EHCP.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	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.

The Plan applies to all children and young people with SEND in the city regardless of ethnicity. National evidence indicates that there are differences in the rates at which SEND is identified across ethnic groups, and that some communities can experience barriers to accessing assessment and support.

No disproportionate adverse impact on any ethnic group has been identified at the strategic level. By increasing local provision and strengthening early identification and inclusive practice, the Plan has the potential to reduce, rather than widen, any differential access to appropriate provision.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor patterns of SEND identification and access to new provision by ethnicity, to ensure the benefits of the Plan are shared equitably.

Engagement and consultation materials for individual provision proposals will be made available in accessible formats and community languages, with translation provided on request, so that families from all backgrounds can engage.

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No disproportionate impact on the grounds of religion or belief has been identified. The Plan is concerned with the sufficiency and type of SEND provision and does not alter the faith or non-faith character of any school.

It is noted that one of the proposed Autism Resource Units is located at Cardinal Newman Catholic School. The siting of provision at a faith school does not, of itself, give rise to an adverse equalities impact, and admission to a resource base attached to a mainstream school is determined by the child's EHCP and assessed need, not by faith.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Where provision is located at a faith school, the Council and the school will ensure that the resource base is inclusive of and welcoming to children of all faiths and none, and that this is clear in the published arrangements for the provision.

The timetabling of consultation activity for individual proposals will take account of significant periods of religious observance.

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.

Autism and SEMH — the two largest and fastest-growing categories of need addressed by the Plan — are, both nationally and locally, identified more frequently in boys. There is, however, growing national recognition that autism in particular is under-identified in girls, who may present differently and be diagnosed later. A sufficiency programme weighted towards autism and SEMH provision could, if not carefully designed, risk entrenching a male-weighted pattern of access.

For staff, the specialist and alternative provision workforce, like the wider education workforce, is predominantly female; changes to provision may therefore have a gendered dimension where they affect staffing.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The design and admission arrangements for new provision will be alert to the under-identification of autism in girls, and the Council will continue work — through early identification, OAIP and the Experts at Hand model envisaged nationally — to ensure girls with SEND are identified and supported.

Any staffing implications arising from changes to provision will be managed through the Council's and schools' usual HR and equalities processes, with an Equality Impact Assessment completed in relation to any HR proposals at the point staff are formally consulted.

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 impact has been identified in relation to gender reassignment. Data is not routinely collected and relies on self-disclosure.

The Council recognises that children and young people with SEND who are also exploring their gender identity may face intersecting vulnerabilities.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Any child or young person who is transitioning or questioning their gender will be supported sensitively in any move to new provision, with settings directed to the Council's Trans Inclusion guidance and to voluntary sector organisations where appropriate

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 impact has been identified in relation to sexual orientation. The Council notes that Brighton & Hove has a nationally significant LGBTQ+ community and that the city's schools generally promote inclusive values.

Sexual orientation data is not routinely collected for pupils.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

New and changed provision will be expected to maintain an inclusive and anti-discriminatory ethos. Families or young people who experience discrimination will be signposted to appropriate support in the city.

6.8 Marriage and Civil Partnership:

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

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

No disproportionate impact in respect of pupils has been identified. For staff, marriage and civil partnership are relevant principally in the context of any HR processes that may arise from changes to provision and are addressed through standard HR procedures.

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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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 disproportionate impact on pupils has been identified. For staff, pregnancy and maternity are relevant in the context of any staffing changes arising from changes to provision, and are

protected through the Council's and schools' HR processes and any EIA undertaken in relation to specific HR proposals.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

No disproportionate impact specific to the armed forces community has been identified. Service children with SEND will benefit from improved local provision in the same way as other children, and Service Pupil Premium continues to be recorded and applied.

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.

No disproportionate adverse impact on migrant, asylum-seeker, refugee or EAL families has been identified at the strategic level. These families can, however, face additional barriers in navigating the SEND system and in engaging with consultation.

By improving the clarity and transparency of the city's strategic approach to SEND sufficiency, the Plan may support better understanding of, and access to, provision for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Consultation and information materials for individual provision proposals will be available in community languages and accessible formats, with translation and interpreting provided on request.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (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.

Parent carers of children with SEND are a key group affected by the Plan, and have been actively engaged in its development through the Parent Carer Council (PaCC), Amaze and the SEN Sufficiency Workstream. Many parent carers currently experience the burden of long daily journeys where their child is placed out of area, and the uncertainty of insufficient local provision.

By increasing local provision and reducing reliance on out-of-area placements, the Plan is expected to reduce travel and logistical burdens on parent carers and to improve continuity for the children they care for. The impact on this group is therefore assessed as positive.

Young carers within the affected school communities are also considered; changes to provision should not increase caring-related barriers to attendance.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will continue to work in partnership with PaCC and Amaze throughout the life of the Plan and the development of individual proposals, ensuring parent carers are involved in the design of provision their children will use.

The needs of young carers will be considered in transition planning for any individual provision proposal.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

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

YES

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

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

SEND is significantly over-represented among care-experienced children and Looked After Children, who are also more likely to experience SEMH needs and to be at risk of exclusion. This group is therefore disproportionately likely to benefit from the provision the Plan creates, including the expansion of Inclusion Intervention Spaces and the continued specialist SEMH provision at the Central Hub Brighton.

Stability and continuity of education are particularly important for this group, and increasing local provision reduces the risk of placement breakdown associated with distant or unsuitable provision. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Virtual School Head will be engaged in the planning and prioritisation of provision and in transition planning for individual care-experienced children moving into new provision.

Personal Education Plans (PEPs) will reflect any changes in provision for individual care-experienced children.

6.14 Homelessness:

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

NO

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

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

No disproportionate adverse impact has been identified. Families in insecure housing may move more frequently and can find continuity of SEND provision harder to maintain; the increase in local provision and the reduction in reliance on distant placements may support greater stability for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The needs of children in insecure housing will be considered through safeguarding and pastoral channels in transition planning for individual proposals.

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

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

NO

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 disproportionate adverse impact has been identified. The Plan does not alter safeguarding arrangements. Children affected by domestic abuse are more likely to present with SEMH needs and may benefit from the provision the Plan supports.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Safeguarding considerations will be embedded in the design and operation of all new and changed provision, and addressed in the project-level EIA for each proposal.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

YES

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

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

SEND and socio-economic disadvantage frequently co-occur, and families experiencing disadvantage are less able to absorb the costs and logistical demands of distant out-of-area placements. The rising cost of out-of-city placements (up approximately £1 million over three years) also places pressure on the High Needs Block, with consequences for the resources available to support all children with SEND.

By creating local provision and reducing reliance on higher-cost distant placements, the Plan is expected to benefit disadvantaged families disproportionately (in a positive sense) and to make more effective use of the High Needs Block. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor access to new provision to ensure disadvantaged children benefit equitably.

Home to School Transport assistance will continue to be available to eligible families, mitigating travel costs for those on low incomes.

6.17 Human Rights:

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

NO

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

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

The Plan engages the right to education (Article 2 of Protocol 1, ECHR) and, in supporting access to appropriate provision, advances rather than restricts that right. The Plan is consistent with the United Nations Convention on the Rights of the Child, in particular the right of children

to express their views (Article 12) and the best interests of the child (Article 3), reflected in the engagement of the SEND Youth Forum.

No adverse human rights impact has been identified.

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

Many children and young people with SEND experience more than one of the characteristics and circumstances considered above. The strategic decision to plan provision now — in anticipation of national reform and ahead of immediate demand pressures — is intended to benefit children with the most complex and intersecting needs, who are currently the most likely to be placed out of area or to have their needs unmet locally.

Two intersectional risk areas are of particular note. First, SEND and socio-economic deprivation intersect significantly: children from more deprived backgrounds are more likely to have their SEND needs identified at a later stage and may face greater barriers to accessing specialist provision, particularly where provision is distant or requires complex transport arrangements. The creation of local provision is expected to benefit this group disproportionately, but the Council must actively monitor whether uptake of new provision reflects the wider SEND population or concentrates in less deprived groups.

Secondly, SEND and ethnicity intersect in complex ways: national evidence points to differences in identification rates across ethnic groups and in the types of need identified, and some communities face greater barriers to EHCP assessment and to engaging with SEND processes. The Plan's strengthening of early identification, OAIP and the mainstream offer is intended to reduce these disparities, but this cannot be assumed and must be evidenced. The Council will

therefore monitor access to new provision by ethnicity and socio-economic disadvantage as a specific equalities duty.

The principal cumulative risk is not in the strategy itself but in implementation: that a phased, multi-year programme of new provision could, if poorly sequenced or communicated, leave some children with complex intersecting needs without suitable provision in the interim, or could create temporary inequity between those who can access new provision early and those who must wait. The use of independent and non-maintained provision in the interim, and the lead times of two to three years for new provision, make careful sequencing essential.

There is also a strategic risk attached to the changes at the Central Hub Brighton and the wider move away from large standalone Pupil Referral Units: children with SEMH needs are among the most vulnerable, and any transition in this provision must be managed so that no child loses access to suitable support during the change.

To mitigate this risk, the following specific measures are in place:

- A dedicated transition plan will be developed for the Central Hub Brighton covering the leadership model changes and any site changes proposed for 2026/2027, setting out how continuity of provision will be maintained for every child currently on roll.
- Individual children's support arrangements will be reviewed and confirmed before any site or leadership change takes effect, with the responsible SEND case officer and the child's family notified in advance.
- The Management Committee of the Central Hub Brighton, which includes Council officer and school representation, will maintain oversight of the transition and will report progress to the SEN Sufficiency Workstream.
- An Equality Impact Assessment will be completed in relation to any formal staffing or structural changes at the Central Hub Brighton before those changes are implemented.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The SEN Sufficiency Workstream, with PaCC and partner representation, will maintain a strategic, intersectional view of need across the life of the Plan and will oversee the sequencing of provision so that the most complex needs are prioritised.

Each individual provision proposal will carry its own Equality Impact Assessment, which will assess intersectional impacts at the level of the specific children and communities affected, including transition arrangements for children moving from existing to new provision.

The changes will be managed so that any individual child's support is maintained through leadership transition at any site change.

Progress against the Plan, including the equitable distribution of its benefits, will be reviewed annually and reported through the Directorate's governance arrangements.

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 — Equality Impact Assessment for each individual proposal

- A full, project-level Equality Impact Assessment will be completed for each individual provision proposal arising from the Plan — including each of the three Autism Resource Units, the further IIS expansion, and the changes at the Central Hub Brighton.
- Each EIA will be initiated at the outset of the statutory or engagement process for the relevant proposal, and will be completed and approved before any decision is taken.
- On the current programme: ARU proposals at Patcham High School and Cardinal Newman Catholic School — EIAs to be completed by autumn 2026; Stanford Junior ARU — EIA to be completed by spring 2027; Central Hub Brighton changes — EIA to be completed prior to any structural change, targeted by summer 2026.
- Each EIA will assess the detailed and intersectional impacts on the specific children and communities affected.

SMART Action 2 — Sequencing and prioritisation of provision and monitoring equitable access to any new provision

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- The SEN Sufficiency Workstream will maintain and review, at least annually (by September each year, aligned to the annual SEND data refresh), a sequencing plan for the provision programme that prioritises children with the most complex and intersecting needs and minimises the period for which any child is without suitable local provision. The SEN Sufficiency Workstream is responsible for this action and will report progress to the Directorate Leadership Team annually.
- The sequencing plan will be informed by the annual data refresh.
- Access to new and expanded provision will be monitored by protected characteristic (in particular sex/gender and ethnicity, and by socio-economic disadvantage and care-experienced status) to ensure the benefits of the Plan are shared equitably.
- This monitoring is the responsibility of the SEN Sufficiency Workstream. Success will be measured by: the proportion of new provision places taken up by children from BAME backgrounds, disadvantaged backgrounds and care-experienced backgrounds reflecting, at minimum, their representation in the local SEND population; no statistically significant gap in access to new provision by ethnicity or socio-economic status emerging over the life of the Plan.
- A cause for concern (requiring escalation to the Directorate Leadership Team) would be if the proportion of new places taken up by any of the monitored groups falls more than 10

percentage points below their share of the SEND cohort for two consecutive annual reviews.

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- Findings will be reported through the Directorate's governance arrangements.

SMART Action 3 — Accessible engagement and communications

- Engagement and communication on the Plan and on each individual proposal will be accessible to all affected groups.
- Materials will be provided in accessible formats and community languages, with translation and interpreting on request, and the views of children and young people with SEND will be actively sought.
- Feedback gathered from PaCC and other recognised representative bodies, through ongoing engagement, will be used as a qualitative monitoring tool to assess how the Plan is being received and whether its intentions are being realised in practice. This feedback will be reported to the SEN Sufficiency Workstream at least twice yearly and will inform the annual review of this EIA. The SEN Sufficiency Workstream is responsible for collating and reporting this feedback. A minimum standard for this action is that structured feedback from PaCC and Amaze is obtained and reviewed at least once in each 12-month period from the date of Cabinet approval of the Plan.

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.

The actions in this EIA will be transferred to the SEN Sufficiency Workstream action log, the SEN Statutory Service Plan, and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Head of Service and to the EDI Team as part of FIAP performance reporting. 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.	X

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.

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

The SEND Sufficiency Plan 2026–2029 is assessed as having a positive overall equalities impact. Its central purpose — to secure sufficient, appropriate and local provision for children and young people with SEND — directly advances equality of opportunity for the group that is its principal beneficiary, and supports the Council in meeting its Section 14 duty and the public sector equality duty.

The adverse impacts identified in this assessment relate principally to the implementation of the strategy rather than to its direction: the sequencing of a multi-year programme, the under-identification of autism in girls, and the equitable distribution of the Plan's benefits across all communities. These are capable of substantial mitigation through the actions set out above and through the individual, project-level Equality Impact Assessments that will accompany each statutory proposal.

The decision to plan now, in anticipation of national SEND and AP reform, rather than to wait for the reforms to be legislated, is considered proportionate given the immediacy of local demand pressures, the long lead times for new provision, and the risk of falling behind the national reform trajectory and missing capital funding opportunities tied to clear local plans.

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 SEND Sufficiency Plan 2026–2029 concludes that the Plan has a positive overall equalities impact, by enabling more children and young people with SEND to access appropriate provision close to home, reducing reliance on out-of-area placements, and making explicit the Council's commitments under the Principles of Belonging and the Ordinarily Available Inclusive Practice guidance.

The assessment identifies a number of implementation risks — principally around the sequencing of new provision, the management of the Central Hub Brighton transition, the under-identification of autism in girls, and the equitable distribution of benefits — and sets out three SMART actions to mitigate them. Critically, each individual provision proposal arising from the Plan, including the three proposed Autism Resource Units, will be the subject of its own statutory process and its own full Equality Impact Assessment before any decision is taken.

Members are asked to have due regard to the equality impacts identified in this assessment, and to 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:

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10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service	
Accountable Manager:	Georgina Clarke-Green, Director Education and Learning	

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

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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:	Lindsey Pearce	

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

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