



Department
for Education

School accountability reform: equality impact assessment

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Introduction

This document records the analysis undertaken by the Department for Education to enable Ministers to fulfil the requirements placed on them by the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010.

The PSED requires the Minister to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

These aims are also known as the three limbs of the PSED.

Overview of School Accountability Reform

Every child and young person in England should have the opportunity to succeed, no matter their background, their circumstances or the neighbourhood in which they live. This requires an accountability system that sets clear expectations, facilitates improvement, and spreads excellence.

We intend to implement our school accountability reform across three areas:

- 1) Accountability principles
- 2) School profiles
- 3) Support and intervention

1. Accountability principles

Improvements to our school system accountability arrangements will be made in line with the following principles:

- drive high and rising standards, supporting all children and young people, regardless of their circumstances, to achieve and thrive
- provide assurance to parents, giving them clear, transparent and reliable information to inform choices, recognising the breadth of what a school does across a range of criteria, including achievement and attendance
- give school leaders, staff and responsible bodies granular insights with sufficient detail about the quality of different elements to help all schools move forward towards excellence
- encourage collaboration through the system so that providers work together for the benefit of all children, young people and learners, drawing on excellence and identifying areas for improvement, creating a truly self-improving system
- be delivered consistently, transparently and to the highest professional standards, with arrangements that are fair and credible, recognising limitations in data, taking appropriate account of context while maintaining high expectations for all children and young people, and only holding schools to account for those things they can control
- be proportionate, taking account of the impact on workload and the wellbeing of leaders, teachers and staff
- be coherent with clear and distinct roles and responsibilities for different actors in the system
- have an emphasis on identifying those providers in need of additional help so that tailored and proportionate intervention can be provided at the right time, including taking action to change the organisation that governs a school where it is necessary to bring about improvement

2. School profiles

We will develop two distinct services: a public school profile and a school improvement service that will facilitate benchmarking and collaboration. School profiles will be a key part of the school accountability system, holding schools to account on a range of published performance measures, just as Compare School and College Performance currently does.

The service aims to support parents in making decisions about their children's education by making school information easier to find and more accessible. The Department's most recent school performance data, closely integrated with Ofsted's point-in-time report cards as they become available, will form the fundamental features of a school profile aiming to help parents make decisions about schools based on current standards and understand Ofsted grades in context. Additional information about schools will recognise the breadth of what a school does across a range of criteria, including achievement and attendance. We will investigate how information like provision for pupil well-being, and a school's enrichment offer can be included within school profiles. We will also explore ways to demonstrate a school's inclusivity within their local communities. In time school profiles will replace Compare School and College Performance.

The sector and sector representatives highlighted the potential for better data use to foster school collaboration and improvement. Recognising the challenge of providing granular data through a single parent-facing service, we will develop a service, accessed through DfE Sign-in, allowing schools to benchmark, connect, and share best practice, promote collaboration and self-improvement. In time the school improvement service, facilitating benchmarking and collaboration will replace Analyse School Performance.

3. Support and Intervention

For schools found by Ofsted to require special measures, structural intervention will become the default approach. Schools requiring significant improvement will 'normally' undergo structural intervention until September 2026, while Regional Improvement for Standards and Excellence (RISE) teams build capacity. From September 2026, targeted RISE intervention will become the default, with structural intervention applied if schools have not secured improvement across all areas after 18 months. These changes depend on the passage of the Children's Wellbeing and Schools Bill, and updated regulations will ensure schools with ongoing concerns remain eligible for intervention.

To allow for targeted RISE intervention in schools that are consistently underperforming, we will amend the Coasting Schools (England) Regulations 2022 to redefine "coasting" schools as "stuck schools", which will include those rated "needs attention" in leadership and governance and previously graded below 'good'.

Stuck schools¹ will receive mandated targeted RISE intervention as a bespoke, collaborative improvement approach if they have not had a change of responsible body since their most recent inspection. Schools will have two years from the introduction of Ofsted's new report cards to achieve secure ratings in all areas, after which structural intervention will be the default if sufficient progress hasn't been made.

RISE teams will engage with small numbers of schools, via their responsible bodies, where pupil attainment is a significant concern. From autumn 2025, RISE teams will undertake informal engagement with schools that have concerning attainment to understand more about their performance and provide opportunities for them to learn from other schools.

¹ Stuck schools are those that have had 2 successive below Good Ofsted single headline grades or the equivalent sub-judgements since August 2024. Following the introduction of Ofsted's school report card, a school is stuck if it has previously received a below good single headline grade or equivalent sub-judgement, and it receives a 'needs attention' for leadership in its report card.

Summary of Evidence

Summary of the evidence considered for each of the protected characteristics in demonstrating due regard to the equality duty:

[Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

[Special educational needs in England, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

[School characteristics, Data set from Schools, pupils and their characteristics - Explore education statistics - GOV.UK](#)

Analysis of Impacts

Every child and young person in England should have the opportunity to succeed, no matter their background, their circumstances, or the neighbourhood in which they live. This requires an accountability system for schools that sets clear expectations, facilitates improvement, and spreads excellence.

We have assessed the impacts of the planned policies in the School Accountability Consultation. The policies will have a neutral impact for most, and a positive impact for some, protected characteristics. We have concluded that, at this stage, the policies will have an overall neutral impact.

Where our policies are still at an early stage of development, our analysis has been proportional to impact. We will continue to evaluate and undertake further Equality Impact Assessments once policy has been developed further.

Age

Accountability principles

While the accountability principles indirectly affect children and young people, they aim to shape policy for school leaders and staff. As these principles specifically refer to providers, leaders, teachers, parents, children and young people, and others of varying ages, there is no disproportionate effect on any age group as a result of these principles. We have therefore identified a neutral impact on age as a result of our accountability principles.

School profiles

School profiles are being designed to support parental decision-making and drive school improvement by making performance data more accessible and contextual, as well as allowing schools to benchmark, connect, and share best practices, promote collaboration and self-improvement.

While the service may indirectly affect pupils of different ages, particularly where data highlights phase-specific trends such as attendance or attainment, it does not differentiate, or target pupils based on age. The profiles present aggregated school-level data and are not designed to influence policy or practice differently for primary versus secondary-aged pupils. We have therefore identified a neutral impact on age as a result of our proposed school profiles, with no evidence of disproportionate effects across age groups.

Support and intervention

Schools previously rated as inadequate (to be known as requires special measures and requires significant improvement) have well above the national average share of secondary school pupils. Data from 2023/34 academic year shows 71% of pupils in these schools are secondary phase compared to 43% of the total school population being in secondary phase². This means that children of secondary age are more likely to be impacted by some of these measures than younger children. However, as these policies will drive more targeted school improvement to those schools in scope, we expect the impact of this measure to be positive for the school, but across all age ranges and all 3 limbs of the PSED, the impact will be neutral.

It is not possible to assess the precise impact these policies will have on those with this characteristic because that can only be properly assessed in a specific instance when intervention takes place. The impact on the three limbs of the PSED duty will vary from context to context. We have therefore identified a neutral impact on age as a result of our policies on support and intervention.

Disability

Accountability principles

15% of pupils across all inadequate schools require Special Educational Needs (SEN) support, compared with 13% across all state-funded schools³. To emphasise the department's commitment to inclusion for all pupils, we have amended the first principle to explicitly refer to supporting all children and young people, **regardless of their circumstances**. However, the commitment to guiding relevant policy development through a lens of inclusion does not have an immediately tangible impact on pupils with Special Educational Needs and Disabilities (SEND) or an Education Health and Care (EHC) plan.

We have therefore identified a neutral impact on disability as a result of our accountability principles.

School profiles

As both services will replace existing digital services that host school performance information, impacts will be minimal. As a public school profile aims to make data more

² [Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

³ [Special educational needs in England, Academic year 2023/24 - Explore education statistics - GOV.UK](#) and ['FSM, Ethnicity and Language, by type of SEN provision and type of need - 2016 to 2024' from 'Special educational needs in England', Permanent data table - Explore education statistics - GOV.UK](#)

accessible to parents it could increase the visibility of information already published. This may have benefits, such as highlighting performance gaps and encouraging schools to address them.

The school improvement service facilitating benchmarking and collaboration will help school leaders to see gaps in their own data, help them to inform areas needed for improvement and seek new strategies to address them, including for pupils with SEN.

As school profiles and the school improvement service are developed, further testing may include exploring the implications of schools inputting their own data, how context might be considered alongside performance data and the presentation of data and other information on SEND. We believe that with careful testing, this will mitigate any negative impacts and promote a more inclusive approach.

The service can be used by people with this protected characteristic, and as outlined in mitigations, steps will be taken to ensure accessibility and inclusion are given due consideration. We have therefore identified a positive impact on disability as a result of our policy on school profiles.

Support and intervention

In the consultation process, concerns were raised about potential negative impacts on learners with SEND, EHC plans, and disadvantaged pupils. Children with disabilities are more likely to be affected. Data from 2023/24 shows:

Table 1: SEN Support, EHCP, and FSM by School Type

School Type	SEN Support	EHCP	FSM
Inadequate Schools	15%	6%	34%
All State-Funded Schools	13%	5%	25%

Sources: [Special educational needs in England, Academic year 2023/24 - Explore education statistics - GOV.UK](#) and ['FSM, Ethnicity and Language, by type of SEN provision and type of need - 2016 to 2024' from 'Special educational needs in England', Permanent data table - Explore education statistics - GOV.UK](#)

As these policies aim to support whole-school improvement, the overall impact on protected characteristics across all three PSED limbs is expected to be neutral. Precise impacts on individuals with protected characteristics can only be assessed in specific contexts. The effect on the PSED will vary accordingly.

Mainstream inclusion is one of the four national priorities for RISE. Our new team of expert RISE advisers will work with mainstream schools to help them become more inclusive places. The advisers include leaders from the SEND and alternative provision sectors, with a track record of improving schools. In overseeing both targeted RISE

intervention and the universal service, they will ensure that support to promote inclusive practice is at the heart of what we offer.

Where future policy uses attainment as a trigger, this could create perverse incentives, discouraging schools from admitting SEND, EHCP, or EAL pupils to protect attainment data. However, a school acting in this way would be in breach of the Schools Admission Code and the Equalities Act, and therefore we assess this to be low risk.

We have therefore identified a neutral impact on disability as a result of our policies on support and intervention.

Gender Reassignment

Accountability principles

The first principle includes a clear and explicit commitment to inclusion, irrespective of circumstances. However, while the principle affirms a general commitment to inclusion, it does not explicitly address how this will impact the protected characteristic of gender reassignment. We are not aware of any evidence regarding potential impacts with this protected characteristic beyond this. We have therefore identified a neutral impact on gender reassignment as a result of our proposed accountability principles

School profiles and support and intervention

As both services will replace existing digital services that already publish school performance information, impacts will be minimal. However, the services, and the proposed support and intervention policies can be used by, and impact, those with this protected characteristic, albeit in a way that affects them no differently than someone without this protected characteristic. We have therefore identified a neutral impact on gender reassignment as a result of our policies on school profiles and support and intervention.

Marriage and Civil Partnership

While teachers and parents with this protected characteristic can interact with, or be impacted by our principles, school profiles, or support and intervention policies, we have identified no substantive impact on those married or in civil partnerships that differ from those without this protected characteristic. We have therefore identified a neutral impact on marriage and civil partnership as a result of our policies.

Pregnancy and Maternity

Accountability principles

While people with this protected characteristic will be impacted by any guiding principles for accountability in schools, we have identified no substantive impact on pregnancy and maternity that differ from those without this protected characteristic as a result of our proposed principles. We have therefore identified a neutral impact on pregnancy and maternity as a result of our proposed accountability principles.

School profiles and support and intervention

While people with this protected characteristic can interact with, and be impacted by, the policies relating to school profiles and support and intervention, we have not identified any substantive impacts relating to this protected characteristic. We have therefore identified a neutral impact on pregnancy and maternity as a result of our policies on school profiles and support and intervention.

Race

Accountability principles

The first principle states that the accountability system will drive high and rising standards, regardless of circumstances, which includes race. However, while the principle affirms a general commitment to inclusion, it does not explicitly address how this will impact the protected characteristic of race. We have therefore identified a neutral impact on race as a result of our proposed accountability principles.

School profiles

As both services will be replacing existing digital services that hosts school performance information, impacts will be minimal. As a public school profile aims to make data more accessible to parents it could increase the visibility of information already published. This may have benefits, such as highlighting performance gaps and encouraging schools to address them. The Department will need to be careful in its design of the service to mitigate any unintended consequences such as stereotyping of school settings, lowering expectations for groups of students, or the possibility of schools avoiding the admission of those who may not achieve as well as others in performance measures.

The school improvement service facilitating benchmarking and collaboration will help school leaders to see gaps in their own data, help them to inform areas needed for improvement and seek new strategies to address them, including for pupils whose first language is not English. We have therefore identified a positive impact on race as a result of our proposed school profiles.

Support and Intervention

As of 1 July 2024, the proportion of pupils from minority ethnic backgrounds is lower in inadequate schools compared to the national average:

Table 2: Minority Ethnic Pupil Percentage by School Type

School Type	Minority Ethnic Pupils
All Inadequate Schools	32%
All State-Funded Schools (National)	37%

Source: [Special educational needs in England, Academic year 2023/24 - Explore education statistics - GOV.UK](#) and 'FSM, Ethnicity and Language, by type of SEN provision and type of need - 2016 to 2024' from 'Special educational needs in England', Permanent data table - Explore education statistics - GOV.UK

Given this, we do not think there is a correlation between race and the likelihood of intervention. However, in 2024/25, 21.4% of pupils were recorded as having a first language other than English⁴.

We have identified a neutral impact on race as a result of our policies on support and intervention.

Religion or Belief

Accountability principles

The first principle includes a clear and explicit commitment to inclusion, irrespective of circumstances. However, while the principle affirms a general commitment to inclusion, it does not explicitly address how this will impact the protected characteristic of religion or belief. We are not aware of any evidence regarding potential impacts with this protected characteristic beyond this. We have therefore identified a neutral impact on religion or belief as a result of our proposed accountability principles.

School profiles

As both services will replace existing digital services that already publish school performance information, impacts will be minimal. However, the services can be interacted with by, and impact, those with this protected characteristic, albeit in a way that affects them no differently than someone without this protected characteristic. We have therefore identified a neutral impact on religion or beliefs as a result of our proposed school profiles.

⁴ [Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

Support and intervention

Data from 2023/24 academic year shows that within the inadequate cohort of schools eligible for this intervention, 85% of pupils attend a school with no religious character. This is greater than the national average, where 77% of pupils attend a school with no religious character⁵. A school is only marginally more likely to be eligible for intervention by attending a non-faith school, so any changes to intervention policy are not significantly more likely to apply to any religious group, including those with no religious belief. This measure will positively impact the school as a whole regardless of protected characteristic. We have therefore identified a neutral impact on religion or belief as a result of our policies on support and intervention.

Sex

Accountability principles

For the protected characteristic of sex, our commitment to inclusion is also driven in part by the fact that 71% of pupils with an EHC plan are male (29% female) and 61% of pupils with SEN are male (39% female)⁶. The first principle includes a clear and explicit commitment to inclusion, irrespective of background. A commitment to inclusion would naturally benefit more boys because they comprise the majority of those with EHC plans. However, while the principle affirms a general commitment to inclusion, it does not explicitly address how this will impact the protected characteristic of sex. We have therefore identified a potential positive impact on sex as a result of our proposed accountability principles.

School profiles

While people with this protected characteristic will be able to interact with, and be impacted by, school profiles, we have identified no substantive impact on sex that differ from those without this protected characteristic as a result of our proposed principles. We have therefore identified a neutral impact on sex as a result of our proposed school profiles.

Support and intervention

For pupils, the proposed support and intervention measures are to drive more targeted school improvement to schools in scope, we anticipate a positive impact for the school as a whole. However, across all 3 PSED limbs we expect the impact to be neutral. For staff,

⁵ [School characteristics, Data set from Schools, pupils and their characteristics - Explore education statistics - GOV.UK](#)

⁶ [Special educational needs in England, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

trustees and governors we anticipate a neutral impact on equality of opportunity and have not identified that the measures will have any negative impacts for this protected characteristic under limbs one, two and three. We have therefore identified a neutral impact on sex as a result of our policies on support and intervention.

Sexual Orientation

Accountability principles

The first principle includes a clear and explicit commitment to inclusion, irrespective of circumstances. However, while the principle affirms a general commitment to inclusion, it does not explicitly address how this will impact the protected characteristic of sexual orientation. We are not aware of any evidence regarding potential impacts with this protected characteristic beyond this. We have therefore identified a neutral impact on sexual orientation as a result of our proposed accountability principles.

School profiles and support and intervention

Both school profile services will replace existing digital services that already publish school performance information, impacts will be minimal. However, the services, and the proposed support and intervention policies can be interacted with by, and impact, those with this protected characteristic, albeit in a way that affects them no differently than someone without this protected characteristic. We have therefore identified a neutral impact on sexual orientation as a result of our policies on school profiles.

The proposed support and intervention measures are to drive more targeted school improvement to schools in scope; we anticipate a positive impact for the school as a whole. However, across all 3 PSED limbs we expect the impact to be neutral. For staff, trustees and governors we anticipate a neutral impact on equality of opportunity and have not identified that the measures will have any negative impacts for this protected characteristic under limbs one, two and three. We have therefore identified a neutral impact on sexual orientation as a result of our policies on support and intervention.

Mitigations

Chapter 1 - Accountability principles

The first principle, and others, emphasise a commitment to high standards for the benefit of all children. There is also an emphasis on leader, teacher, and staff workload and wellbeing, which will mitigate against any impacts on protected characteristics.

Chapter 2 - School profiles

We are developing two new services that aim to help parents find useful information about schools so that they can make informed choices about their children's education and help schools to improve. We are carrying out user testing to ensure that both services will not disproportionately impact those with protected characteristics, and will be piloting a first version of both services in the 2025/2026 academic year.

Disability

As school profiles are developed and iterated, we will consider the risks of data inclusion and test designs that aim to mitigate unintended consequences relating to disability. Mitigations might include changes to the way performance data is presented to reduce the risk that they act as a disincentive to SEND inclusion in mainstream schools.

We are carrying out further testing and will be piloting a first version of school profile services in the 2025/2026 academic year to ensure that it will not disproportionately impact those with protected characteristics. This may include exploring:

- How to present SEN metrics in a way that accounts for context and progresses the use of a standardised template to ensure fairness and limit data being input by schools
- We will present the profile in an accessible format that can be accessed by those with a disability. At the end of each stage of development, school profiles will undergo a Government Digital Service (GDS) assessment, which helps to ensure that public-facing services are accessible, user-friendly, and meet user needs, including those of people with disabilities.
 - Services must meet web content accessibility guidelines and undertake accessibility audits. These cover visual, motor, auditory, speech, and cognitive impairments. These are assessed in code, content, and design.
 - Manual accessibility testing include keyboard only navigation, screen-reader compatibility, zooming and responsive behaviour, colour contrast and focus indicators.

Data will be suppressed for schools with small cohorts of pupils with SEN to prevent students being made identifiable.

Race

As school profiles are developed and iterated, we will consider the risks of data inclusion and test designs that aim to mitigate against unintended consequences relating to race. Data will be suppressed for schools with small cohorts of pupils whose first language is not English to prevent students being made identifiable.

The design of the content on school profiles will minimise linguistic complexity. All public services are expected to use plain English, including short sentences and everyday words. Good design will support people with EAL. Designs will ensure use of clear headings, consistent layouts and visual cues. Important information will not be embedded in images which cannot be translated by screen readers or machine tools.

Chapter 3 - Support and Intervention

Disability

RISE provides mandated targeted support to “stuck” schools and a universal offer to promote system-wide improvement. Some schools with Good Ofsted ratings still have poor outcomes; the universal offer will include these to avoid support gaps. Tailored interventions and universal support, to ensure the needs of pupils with SEND are met, will offer mitigation to the potential negative impacts on pupils with a disability.

Alongside our accountability reforms we are working to improve how we promote universal wellbeing interventions for the workforce. We recently issued and promoted updated resources on our ‘Improve workload and wellbeing for school staff’ service, developed alongside school leaders. The service contains a range of supportive resources for schools to review and adapt to improve staff wellbeing. We will continue to work with school leaders to improve and expand this service.

One of our approaches to personal support for leaders is professional supervision, a form of mental health and wellbeing support delivered by the charity Education Support and funded by the department. The programme provides school and college leaders with an opportunity to discuss and process challenges they are experiencing at work. We continually work with Education Support to improve the delivery of the programme, its reach and how it is targeted, as well as with the Supervision in Education Network to promote the benefits of supervision for leaders.

Our education staff wellbeing charter is an important universal set of commitments and resources for staff across the sector, with 4,100 schools and colleges currently signed

up. We are working with the sector to update the charter to improve how it supports school leaders to remove workload and wellbeing barriers, develop supportive wellbeing cultures, and retain the best staff.

We will work with the Improving Education Together (IET) partnership to explore further opportunities to support headteachers, particularly in the context of inspection visits and outcomes.

Decision making

We have assessed the cumulative impacts of the planned policies in this consultation and have concluded that there is no adverse or disproportionately negative impact on people who share a protected characteristic.

A number of policies are recommending further engagement with the sector or are in early stages of development. As policies progress, we will continue to evaluate and undertake further EIAs as required to reassess whether any of these protected characteristics are impacted.

Summary Tables

Chapter 1: Accountability principles

Table 3: Chapter 1 Equality Impacts by Limb

Protected Characteristic	Limb 1 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act	Limb 2 - advance equality of opportunity between people who share a protected characteristic and those who do not	Limb 3 - foster good relations between people who share a protected characteristic and those who do not
Age	N/A	Neutral	Neutral
Disability	Neutral	Neutral	Neutral
Gender Reassignment	Neutral	Neutral	Neutral
Marriage and Civil Partnership	Neutral	N/A	N/A
Pregnancy and Maternity	Neutral	Neutral	Neutral
Race	Neutral	Neutral	Neutral
Religion or belief	Neutral	Neutral	Neutral
Sex	Neutral	Neutral	Neutral
Sexual orientation	Neutral	Neutral	Neutral

Chapter 2: School profiles

Table 4: Chapter 2 Equality Impacts by Limb

Protected Characteristic	Limb 1 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act	Limb 2 - advance equality of opportunity between people who share a protected characteristic and those who do not	Limb 3 - foster good relations between people who share a protected characteristic and those who do not
Age	N/A	Neutral	Neutral
Disability	Neutral	Positive	Neutral
Gender Reassignment	Neutral	Neutral	Neutral
Marriage and Civil Partnership	Neutral	N/A	N/A
Pregnancy and Maternity	Neutral	Neutral	Neutral
Race	Neutral	Positive	Neutral
Religion or belief	Neutral	Neutral	Neutral
Sex	Neutral	Neutral	Neutral
Sexual orientation	Neutral	Neutral	Neutral

Chapter 3: Support and Intervention

Table 5: Chapter 3 Equality Impacts by Limb

Protected Characteristic	Limb 1 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act	Limb 2 - advance equality of opportunity between people who share a protected characteristic and those who do not	Limb 3 - foster good relations between people who share a protected characteristic and those who do not
Age	N/A	Neutral	Neutral
Disability	Neutral	Neutral	Neutral
Gender Reassignment	Neutral	Neutral	Neutral
Marriage and Civil Partnership	Neutral	N/A	N/A
Pregnancy and Maternity	Neutral	Neutral	Neutral
Race	Neutral	Neutral	Neutral
Religion or belief	Neutral	Neutral	Neutral
Sex	Neutral	Neutral	Neutral
Sexual orientation	Neutral	Neutral	Neutral

Consideration of Deprivation and Free School Meals

Although deprivation and eligibility for free school meals (FSM) are not protected characteristics, they were commented upon during the consultation and are important contextual factors. Schools in more deprived areas, often identified by higher levels of FSM, frequently serve pupils who also belong to groups with protected characteristics, such as ethnic minorities, children with disabilities. This overlap suggests that policies affecting schools in deprived areas may indirectly impact children with protected characteristics, even when applied consistently across all settings.

Accountability principles

The revised accountability principles, particularly the explicit commitment to supporting all children “regardless of their circumstances,” are intended to ensure that socio-economic disadvantage is not a barrier to high standards. By embedding inclusion and contextual understanding into the principles, the reforms aim to avoid penalising schools serving high-FSM populations.

However, without careful implementation, there remains a risk that performance measures could disproportionately affect schools in deprived areas. This can be mitigated through due consideration given to disadvantage and deprivation when implementing school profiles, RISE and any other accountability tools. The overall effect is therefore assessed as neutral.

School profiles

As both services will be replacing existing digital services that host school performance information, impacts will be minimal. As a public school profile aims to make data more accessible to parents it could increase the visibility of information already published. This may have benefits, such as highlighting performance gaps and encouraging schools to address them. School profiles are still in development and further testing may include exploring the implications of how schools input their own data, how context might be considered alongside performance data and the presentation of data and other information on SEND. We believe that with careful testing, this will mitigate any negative impacts and promote a more inclusive approach.

The school improvement service facilitating benchmarking and collaboration will help school leaders to see gaps in their own data, help them to inform areas needed for improvement and seek new strategies to address them, including for pupils. Therefore, the overall effect is assessed as positive.

Support and Intervention

The targeted nature of RISE intervention means that if disadvantage or deprivation is identified by RISE teams as a contributing factor to a school's underperformance, interventions can be tailored to address those specific challenges. However, RISE is not explicitly designed to target deprivation in isolation, and its engagement is primarily triggered by Ofsted judgements or concerning attainment trends. As such, while disadvantaged pupils may benefit from RISE support in schools where deprivation is a factor, the intervention is not expected to deliver a disproportionately positive impact for this group compared to others. The overall effect is therefore assessed as neutral, with the potential for positive outcomes where disadvantage is a recognised driver of school improvement needs.

Monitoring evaluation and action plan

The Public Sector Equality Duty is a continuing duty, and the public authority is required to keep the equalities impacts of a policy proposal under review. Accordingly, this EIA will be reviewed regularly following an analysis of any other relevant data and meeting with stakeholders. For school profiles, we will produce another EIA as the services are developed to reflect any additional impacts that are identified. We will continue to monitor the impact on protected characteristics through the individual policy areas.

Annex

Annex A: Relevant Data on Pupils / Workforce

- As of June 2025, there were 9,032,426 pupils attending 24,479 schools in England. This includes all state-funded nursery, primary, secondary and special schools, non-maintained special schools, pupil referral units, general hospital schools and independent schools⁷.
 - 25.7% of these pupils are eligible for free school meals (FSM). This represents almost 2.2 million pupils. The highest eligibility rates are seen in the North East where 32.3% of pupils are eligible for free school meals, and West Midlands where 30.9% of pupils are eligible for free school meals.
 - Rates of free school meals eligibility in 2025 were highest among pupils in the Traveller of Irish heritage ethnic group (67.3%) and Gypsy/Roma ethnic group (61.2%). Rates were lowest among pupils of Indian (7.5%) and Chinese ethnic groups (7.5%).
- As of June 2025, 38% of pupils were from a minority ethnic background⁸.

Table 6: School Population by Ethnicity 2024/25

Ethnicity	Percent	Headcount
Total	100	8,449,209
White - White British	60.4	5,096,013
White - Any other White background	7.1	600,734
Black - Black African	5.2	437,625
Asian - Pakistani	4.7	393,720
Asian - Indian	4.2	351,620
Mixed - Any other Mixed background	2.9	245,017
Any other ethnic group	2.5	210,504
Asian - Any other Asian background	2.3	192,938
Asian - Bangladeshi	1.8	152,024

⁷ [Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

⁸ Those pupils of all school age who have been classified according to their ethnic group and are of any origin other than White British are defined as being of minority ethnic background in this release

Ethnicity	Percent	Headcount
Mixed - White and Asian	1.7	146,348
Unclassified	1.6	138,423
Mixed - White and Black Caribbean	1.6	134,001
Black - Black Caribbean	0.9	76,646
Mixed - White and Black African	1.0	80,582
Asian - Chinese	0.8	65,703
Black - Any other Black background	0.8	64,719
White - Gypsy/Roma	0.3	28,416
White - Irish	0.2	20,144
White - Traveller of Irish heritage	0.1	6,586

Source: [Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

- 78.2% of pupils were recorded as having a first language known or believed to be English⁹.
- Over 1.7 million pupils in England have special educational needs (SEN)¹⁰. 5.3% of pupils (482,640) in England have a EHC plan. There are 14.2% of pupils (1,284,284) with SEN support / SEN without EHC plan¹¹.
 - The percentage of pupils with an EHC plan has increased to 5.3%, from 4.8% in 2024. The percentage of pupils with SEN (SEN support) but no EHC plan has increased to 14.2%, from 13.6% in 2024.
 - 71% of pupils with an EHC plan are male (29% female) and 61% of pupils with SEN are male (39% female).
 - 43.8% of pupils with an EHC plan and 39.3% of pupils with SEN support are eligible for free school meals in 2025. This compares to 22.2% of all pupils in schools without SEN.

⁹ A pupil is recorded to have English as an additional language if they are exposed to a language at home that is known or believed to be other than English. This measure is not a measure of English language proficiency or a good proxy for recent immigration

¹⁰ The most common type of need for those with an EHC plan is autistic spectrum disorder and for those with SEN support is speech, language and communication needs.

¹¹ [Special educational needs in England, Academic year 2024/25 - Explore education statistics - GOV.UK](#)

Annex B: An assessment of pupils' protected characteristics in academies

- At January 2025¹², while 46.1% of all schools were academies, over half of all pupils (58.4%) were attending an academy. This is due to higher proportions of secondary schools being academies than primary, with typically much higher numbers of pupils. At January 2024:
 - 46.1% of primary schools are now academies or free schools, accounting for 47.3% of the primary school population
 - 83% of secondary schools are academies or free schools, accounting for 82.7% of secondary school pupils
 - 49.6% of special schools (excluding non-maintained special schools) are academies or free schools, accounting for 46.4% of special school pupils

¹² [Schools, pupils and their characteristics, Academic year 2024/25 - Explore education statistics - GOV.UK](#)



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