

Equality Impact Analysis

Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users¹.

EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people². EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010³.

This template sets out the steps you need to take to complete an EqIA for your project. Guidance for sections is in the end-notes. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

Title of Project/Service/Policy⁴	Highway Network Resilience Plan
Team/Department⁵	Highways
Directorate	Communities, Economies and Transport
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope⁶	<p>The Highway Network Resilience Plan will set out how and where we prioritise maintenance and other measures to maintain economic activity and access to key services during situations such as extreme weather or where there is a lack of resources to deal with the entire network equally. This is in addition to existing plans which only deal with ice and snow.</p> <p>It will complement the Highway Asset Policy and Strategy which sets out our risk-based approach to maintenance of the whole network. The Plan will be developed in line with the recommendations in the UK Roads Liaison Group Well Managed Highway Infrastructure: A Code of Practice (WMHI Code).</p>

The purpose of our Highway Network Resilience Plan is to set out how we:

- Define key locations and routes.
- Identify the Resilient Network by identifying the most suitable routes.
- Prioritise maintenance to minimise risk to the Network
- Respond to emergency events that affect the Network.

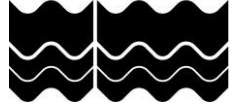
We will follow the detailed guidance of the WMHI Code of Practice in choosing key locations and routes and in developing a proportionate approach. This includes:

- Connectivity between major communities
- Links to the strategic highway network
- Connectivity across authority boundaries where appropriate
- Links to transport interchanges
- Access to emergency facilities including Fire and Rescue, Police, Ambulance Services and hospitals
- Links to critical infrastructure (ports, power stations, water treatment works etc)
- Principal public transport routes, access to rail and bus stations, and to bus garages and other depots
- Other locally important facilities.

The Code of Practice takes into consideration the needs of all users including those with protected characteristics. Therefore, this Equality Impact Assessment will be used to help identify any other needs and priorities of local service users.

The highways service covers the entire county of East Sussex, and we will consult with the following key stakeholders. Stakeholders have been identified with support from the Emergency Planning and Resilience team.

In addition to our own research, these stakeholders will have knowledge of the needs of those with protected characteristics who access their services and will be able to advise accordingly.



Internal Stakeholders

- Highway Maintenance Contractor teams involved in implementing plan
- Public Transport Team
- Flood Risk Management Team
- Emergency Planning Team
- Infrastructure, Planning and Place Team
- Major Projects and Growth Team

External Stakeholders

- Neighbouring highway authorities that share a border
- Sussex Resilience Forum members: Police, Fire, Ambulance, NHS, Coastguards
- Transport for the South East
- Network Rail
- Bus operators
- National Highways
- District and Borough Council Emergency Planning Teams

Initial assessment of whether your project requires an EqlA

When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	Yes		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	Yes		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	Yes		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?		No	
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents?		No	
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?		No	
7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?		No	

If you have answered "YES" or "DON'T KNOW" to any of the questions above, then the completion of an EqlA is necessary.

The need for an EqIA will depend on:

- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
	This Policy is Medium Risk due to its significance and the potential numbers of people affected.	

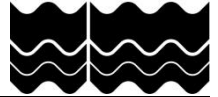
1. Update on previous EqlAs and outcomes of previous actions (if applicable)⁷

What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What further actions do you need to take? (add these to the Action Plan below)
No previous EqlA		

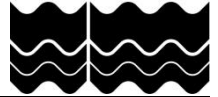
2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

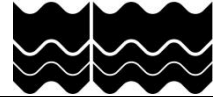
Protected characteristics groups under the Equality Act 2010	What do you know⁸? Summary of data about your service-users and/or staff	What do people tell you⁹? Summary of service-user and/or staff feedback	What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)	What can you do¹¹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age¹²	<p>East Sussex has a higher population (6.3% higher) of people aged over 65yrs than the average for England and Wales, but below average in age groups 0-44yrs.</p> <p>Different age groups may have different priorities in terms of the services that are important to them. E.g. Elderly people may be more likely to need access to emergency medical care and may be less resilient to coping without access to key infrastructure.</p>	<p>In extreme cold weather, we are often contacted by organisations such as schools, GP surgeries and elderly residents who are based on streets that are not on our usual gritting network asking for assistance with accessing the network. Elderly residents often feel that they are at more risk than others.</p> <p>We have received no other specific comments regarding this protected characteristic in relation to services that will be provided by the</p>	<p>The potential impact for different age groups will vary depending on the situation and individual circumstances. E.g. social isolation or need/ability to access individually important services. Some age groups are likely to be more affected than others by network condition or road closures.</p> <p>The essential services and routes identified in the WMHI Code of Practice are those that are considered to be the most important for people of all ages. Therefore, the Plan is expected to have a positive impact for all and</p>	<ol style="list-style-type: none"> 1. The Resilient Network will aim to include access to services that are important for all users as detailed in the WMHI Code of Practice. This includes key public transport hubs. 2. We will consult with service providers e.g. Ambulance Services, who have local knowledge of the needs of users with protected characteristics who access their services. Their feedback will be used to inform the final Plan. 3. We will ensure that our network can be adjusted or amended during an emergency, e.g. to allow for the inclusion of clinics for vaccinations or to help an emergency service reach a



<p>Protected characteristics groups under the Equality Act 2010</p>	<p>What do you know⁸? Summary of data about your service-users and/or staff</p>	<p>What do people tell you⁹? Summary of service-user and/or staff feedback</p>	<p>What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)</p>	<p>What can you do¹¹? All potential actions to:</p> <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>Young people and elderly people may be more reliant on public transport for travel.</p>	<p>Highway Network Resilience Plan.</p>	<p>particularly those who are more reliant on the key services included.</p> <p>No evidence has been found to suggest that anyone with this protected characteristic will experience an unacceptable impact.</p>	<p>particular destination where appropriate. This will allow us to meet the needs of those with protected characteristics in specific circumstances that had not been anticipated at the time of writing the plan.</p> <ol style="list-style-type: none"> 4. The Winter Service Plan which supports the Resilience Plan is reviewed annually and considers specific feedback on ice and snow. 5. Most parts of the County can be accessed by alternative routes if the usual route is inaccessible. East Sussex Highways puts diversion routes in place for prolonged works and publishes details on our website. 6. Requests to deal with issues on other parts of the network can be dealt with on a case-by-case basis following other Highway Policies which allow for a risk based approach. E.g.

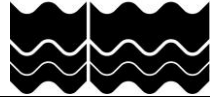


<p>Protected characteristics groups under the Equality Act 2010</p>	<p>What do you know⁸? Summary of data about your service-users and/or staff</p>	<p>What do people tell you⁹? Summary of service-user and/or staff feedback</p>	<p>What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)</p>	<p>What can you do¹¹? All potential actions to:</p> <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				<p>Inspection Manual, Asset Management Plans, Business Continuity Plans.</p> <p>7. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.</p>
<p>Disability¹³</p>	<p>East Sussex has a higher population of people with a disability than the average for England and Wales, with 20.3% in comparison to 17.9% with a long-term health problem or disability.</p> <p>People with some disabilities may have different needs in terms of access to services. E.g. people</p>	<p>Feedback on our Winter Service Plan has included communication from disabled residents that some are more affected than others by ice and snow and that this can make it harder for them to receive care.</p> <p>We have received no other specific comments regarding this protected characteristic in relation to services that will be</p>	<p>As for age.</p> <p>In addition, people with some types of disability may not be able to access information about the Resilient Network or provide feedback as easily as others.</p>	<p>1. As for age.</p> <p>2. East Sussex Highways offers a range of ways for customers to get in touch including website, online forms, letter and phone. Staff can provide explanations in a suitable format in response to questions.</p>

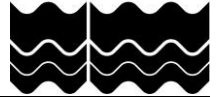


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	with disabilities that prevent them from driving may have a higher reliance on public transport. Some may also have a greater need for access to medical care or other key services.	provided by the Highway Network Resilience Plan.		
Gender reassignment¹⁴	The government estimate there to be approximately 200,000-500,000 trans people in the UK. We are not aware of any published evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.	We have received no specific comments regarding this protected characteristic in relation to this Plan or our Winter Service Plan which provides a similar service.	No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan.	1. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.

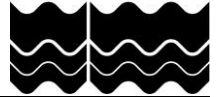
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Pregnancy and maternity¹⁵	<p>East Sussex Statistics generally follow the national average.</p> <p>People who are pregnant or have recently given birth may be more likely to need access to emergency healthcare for themselves or for the baby.</p>	<p>We have received no specific comments regarding this protected characteristic in relation to this Plan or our Winter Service Plan which provides a similar service.</p>	<p>The Plan is expected to have a positive impact for all and particularly those who are more reliant on the key services included.</p>	<p>1. As for age.</p>
Race/ethnicity¹⁶ Including migrants, refugees and asylum seekers	<p>East Sussex's population is largely made up of White British and Northern Irish.</p> <p>Those of other races/ethnicities may be more likely not to have English as a first language.</p> <p>We are not aware of any published</p>	<p>We have received no specific comments regarding this protected characteristic in relation to this Plan or our Winter Service Plan which provides a similar service.</p>	<p>People who do not have English as a first language may experience difficulty in reading the Plan or providing feedback.</p> <p>No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan in other ways.</p>	<p>1. East Sussex Highways offers a range of ways for customers to get in touch including website, online forms, letter and phone. Staff can provide explanations in a suitable format in response to questions.</p> <p>2. Translation or alternative texts will be provided when required for people wishing to find out more about the Plan or provide feedback.</p>



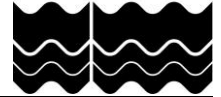
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	<p>evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.</p>			<p>3. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.</p>
<p>Religion or belief¹⁷</p>	<p>East Sussex follows the national average with more than 50% of resident having a Christian belief, more than 25% of residents with no religion plus a variety of other religions and beliefs.</p> <p>We are not aware of any published evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.</p>	<p>We have received no specific comments regarding this protected characteristic in relation to this Plan or our Winter Service Plan which provides a similar service.</p>	<p>No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan.</p>	<p>1. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.</p>



Protected characteristics groups under the Equality Act 2010	What do you know⁸? Summary of data about your service-users and/or staff	What do people tell you⁹? Summary of service-user and/or staff feedback	What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)	What can you do¹¹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Sex/Gender¹⁸	East Sussex has a slightly larger population of females than males. We are not aware of any published evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.	We have received no specific comments regarding this protected characteristic in relation to this Plan.	No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan.	1. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.
Sexual orientation¹⁹	Government estimates that 5-7% of the population is Lesbian, Gay and Bisexual. We are not aware of any published evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.	We have received no specific comments regarding this protected characteristic in relation to this Plan.	No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan.	1. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.



<p>Protected characteristics groups under the Equality Act 2010</p>	<p>What do you know⁸? Summary of data about your service-users and/or staff</p>	<p>What do people tell you⁹? Summary of service-user and/or staff feedback</p>	<p>What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)</p>	<p>What can you do¹¹? All potential actions to:</p> <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
<p>Marriage and civil partnership²⁰</p>	<p>East Sussex Statistics generally follow the national average.</p> <p>We are not aware of any published evidence that people with this protected characteristic have different needs in an emergency affecting the highway network.</p>	<p>We have received no specific comments regarding this protected characteristic in relation to this Plan.</p>	<p>No evidence has been found to suggest this protected characteristic will experience disproportionate impact of the Plan.</p>	<p>1. We will keep the Plan under review and include any feedback about any unequal effect of the Plan on people with this protected characteristic in future Equality Impact Assessments.</p>
<p>Impacts on community cohesion²¹</p>	<p>This project covers the whole of East Sussex which includes all Parish, Town, District, Borough Councils and various local community associations and volunteer groups.</p> <p>Due to the rural and dispersed pattern of residents, businesses and services in East</p>	<p>Some groups / residencies hold a perception that they are 'missing out'. They believe that the more affluent areas have a greater focus for investment.</p> <p>Based on feedback of our winter gritting network, some may feel that smaller communities and</p>	<p>A potential impact may be that there is negative press or feeling towards ESCC due to the perception that some areas are better served by the Resilient Network than others.</p> <p>However, the Plan is expected to have a positive impact for all, and no evidence has been found to suggest that the</p>	<p>1. The Highway Network Resilience Plan sets out our process (based on WMHI) for selecting routes for the Resilient Network. These include access to key medical facilities, emergency services, major transport links and connections between major communities. The Plan will be written in Plain English and published on our website so that people can understand</p>



<p>Protected characteristics groups under the Equality Act 2010</p>	<p>What do you know⁸? Summary of data about your service-users and/or staff</p>	<p>What do people tell you⁹? Summary of service-user and/or staff feedback</p>	<p>What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)</p>	<p>What can you do¹¹? All potential actions to:</p> <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>Sussed, the Resilient Network cannot connect every community in the County.</p>	<p>facilities should also be part of the Resilient Network.</p>	<p>plan will have an unacceptable effect on community cohesion.</p>	<p>the reasoning behind maintenance priorities.</p> <ol style="list-style-type: none"> 2. In addition, our website and the Guide to Highways which provide a Plain English explanation of the asset management approach, will be updated to include information on the Resilient Network. This will help residents to understand our decision making. 3. East Sussex Highways offers a range of ways for customers to get in touch including website, online forms, letter and phone. Staff can provide explanations in response to questions. 4. We will keep the Plan under review and include any feedback about the impact on community cohesion in future Equality Impact Assessments.

Additional categories

(Identified locally as potentially causing / worsening inequality)

Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
Rurality²⁶	<p>The landscape in East Sussex is predominantly rural, however much of the population live in urban areas, 58% live in the coastal urban areas and a further 18% live in market towns.</p> <p>The maintenance requirements in rural areas are often different to urban areas, because of the environment, how the road network is used and expectations about how the countryside should look. This difference is set out in our Policy documents.</p> <p>Although fewer people live in rural areas, there is no difference</p>	<p>Some groups / residencies hold a perception that they are 'missing out'. They believe that the more urban areas have a greater focus for investment.</p> <p>Based on feedback of our winter gritting network, some may feel that smaller communities and facilities should also be part of the Resilient Network.</p>	<p>Some people living or travelling to some small rural communities will have less access to the Resilient Network than those in major communities.</p> <p>There may potentially be negative press or feeling towards ESCC due to the perception that some areas are better served by the Resilient Network than others.</p> <p>However, the Plan is expected to have a positive impact for all, and no evidence has been found to suggest that the plan will have an unacceptable effect on this protected characteristic.</p>	<ol style="list-style-type: none"> 1. As for Community Cohesion. 2. Our risk based, asset management approach to highway maintenance recommends prioritising services where they will have the biggest impact and the Plan aims to follow this approach. 3. All major communities and services will be connected by the Resilient Network whether they are in rural areas or not. 4. Routes chosen for the Resilient Network will ensure that all communities will only be a short distance from the Resilient Network. Most parts of the County can be accessed by alternative routes if the usual route is inaccessible. East Sussex Highways puts diversion routes in place for prolonged works and publishes details on our website.

Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
	<p>between people in rural and urban areas in terms of their need to have access to the Resilient Network.</p>			<p>5. We will take into consideration the fact that East Sussex is a largely rural county with remote communities and key services. This means the Resilient Network will be slightly longer than average.</p> <p>6. We will keep the Plan under review and include any feedback about the impact of the Plan on people with this characteristic.</p>
<p>Carers</p>	<p>East Sussex has an aging population. Therefore, it could be inferred that the number of carers will be proportional.</p> <p>Carers could potentially be prevented from carrying out an essential role if the highway is inaccessible.</p>	<p>Feedback on our Winter Service Plan has included communication from disabled/elderly residents that ice and snow can make it harder for their carers to reach them.</p> <p>We have received no other specific comments regarding this protected characteristic in relation to this Plan.</p>	<p>Being unable to travel on the highway network could have an impact on the health and wellbeing of the people that carers are caring for. It may also increase the time and resources that the carer spends on caring.</p> <p>However, the implementation of the Plan should have a positive impact on carers' abilities to carry out their role as it will minimise disruption on the most important network of roads across the county.</p>	<p>1. As for age and disability.</p>

Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
			<p>No evidence has been found to suggest this protected characteristic will experience an unacceptable impact.</p>	
<p>Literacy/ Numeracy</p>	<p>22.6% of people in East Sussex do not hold a qualification, comparable to national levels (22.7%) not as low as the South East (19.1%). It is difficult to quantify the level of literacy and numeracy because the lack of a formal qualification does not mean a person has poor literacy or numeracy skills.</p> <p>We are not aware of any published evidence that people with this protected characteristic have different needs in an</p>	<p>We have received no specific comments regarding this protected characteristic in relation to this Plan.</p>	<p>A potential impact may be that a person may not be able to read or understand the Plan or provide written feedback.</p>	<ol style="list-style-type: none"> 1. We follow ESCC equality commitments which include guidance on making information accessible. 2. The Plan is written in Plain English and a map is included with the Plan, providing a visual representation. 3. East Sussex Highways offers a range of ways for customers to get in touch including website, online forms, letter and phone. Staff can provide verbal explanations in response to questions. 4. We will keep the Plan under review and include any feedback about the impact of the Plan on people with this protected characteristic.

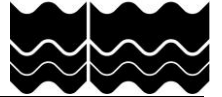
Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
	emergency affecting the highway network.			
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note) ²⁷	We are not aware of any published evidence that people with other protected characteristics have different needs in an emergency affecting the highway network.	We have received no specific comments regarding this protected characteristic in relation to this Plan.	N/A	1. We will keep the Plan under review and include any feedback about the impact of the Plan on people with other protected characteristics.

Assessment of overall impacts and any further recommendations²⁸ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)

The highways service affects a large group of stakeholders and anyone that uses the highway network in East Sussex. This assessment has shown that a Highway Network Resilience Plan based on the recommendations in the WMHI Code of Practice should have a positive impact for all network users and particularly those with protected characteristics that have a greater than average need of essential services and key infrastructure.

Local needs will be established through consultation with key stakeholders that provide essential services during emergencies. They will have local knowledge of the needs of users with protected characteristics who access their services, and this will help to ensure the Plan meets the needs of all.

The Resilient Network will consist of routes across the whole County ensuring that all users will only ever be a short distance from the Network. Our other Highway Policies, Strategies and Plans set out an approach to ensuring the highway is in the best condition for the funding available, which minimises the risk to routes both on and off the Resilient Network. The number of alternative routes to any part of the Resilient Network will help ensure access is maintained even in a situation where there are some road closures.

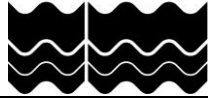


Most of the potential impacts will be mitigated through existing Highway services. For example, the Network Management service which manages road closures and diversions, and our Customer Contact Centre and Communications Plans which ensures information and the opportunity to make enquiries and provide feedback is accessible for all.

To ensure the most important services are prioritised, it will not be possible to include all services e.g. schools and GP surgeries in the Plan. However, other Highway Policies and processes are in place that ensure that risks are dealt with appropriately. In addition, the Plan will be written with an element of flexibility to allow additional routes or services to be added/changed if necessary to meet users' needs in any unforeseen situation, following advice from the Corporate Management Team or Sussex Resilience Forum.

3. List detailed data and/or community feedback that informed your EqlA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
ESCC Equality and Diversity Policy	Sept 2015		Update EqlA if Policy updates change goals.
2011 Census	2011	Ten-years between Census	Update EqlA if changes in the proportions of those with protected characteristics has a significant effect on risk.
Customer Complaints (ESCC and East Sussex Highways)	May 2016 – August 2022	Not all concerns are raised as an official complaint. New concerns may have been raised since last review.	Also review customer enquiries logged by the Customer Contact Centre. See row below. Review complaints when reviewing EqlA.
Salesforce – Customer phone calls, emails, web reports and letters that are logged onto the system. Keyword search for protected characteristics and linked terminology related to Winter Service.	May 2016 – August 2022	Not all enquiries regarding protected characteristics may include keywords. However, the sample size is high enough to ensure that trends can be identified. New concerns may have been raised since last review.	Remind the CS team of the importance of capturing information relevant to those with protected characteristics and of passing any policy complaints to the Contracts Management Group for review. Review complaints when reviewing EqlA.
Consultation with key stakeholders for Highway Network Resilience Plan	September 2022	Potential for not engaging with all relevant stakeholders. Not everyone will respond.	Seek advice from the Sussex Resilience Forum, ESCC Economic Development Teams and Equality Leads on appropriate stakeholders.



		Unhappy consultees are more likely to respond.	Review plan with key stakeholders providing full details of the rationale behind the plan and opportunities to respond.
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4. Prioritised Action Plan²⁹

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p>Plan does not meet local need/priorities. All</p>	<p>We will seek advice on appropriate consultees from the Sussex Resilience Forum, Economic Development Teams and Equality Leads.</p> <p>EQIA will be used prior to consultation to ensure acknowledgment and consultation of the relevant protected characteristics / groups.</p> <p>Existing policies and processes already in place that set out an approach to keeping other parts of the network safe and serviceable.</p> <p>We will ensure that our network can be adjusted or amended during an emergency, e.g. to allow for the inclusion of clinics for vaccinations or to help an emergency service reach a</p>	<p>Plan is fit for purpose and either has a positive impact or no negative impact on those with protected characteristics.</p>	<p>Minimal negative feedback. Is shown to be effective during an emergency.</p>	<p>Autumn 2022. During development of plan</p> <p>Reviewed every 2 years as a minimum.</p> <p>Ongoing reviews.</p>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
	<p>particular destination where appropriate. This will allow us to meet the needs of those with protected characteristics in specific circumstances that had not been anticipated at the time of writing the plan.</p> <p>We will review the Plan regularly under our established policy review process. This includes analysing cases received from the public and reviewing the EqlA. Stakeholders will be told that they can provide feedback and update us on the location of key services/routes at any time.</p>			
<p>Perception of ‘missing out’ on investment or inclusion in Resilient Network.</p> <p>Community Cohesion Rurality Potentially All</p>	<p>The Highway Network Resilience Plan will set out our process (based on WMHI) for selecting routes for the Resilient Network. Plan will be published on our website and information included in the Guide to Highways.</p>	<p>Improved understanding of maintenance decisions.</p>	<p>Minimal complaints on this topic.</p>	<p>Following approval of plan.</p>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p>Some people in small/remote communities may be further from the Resilient Network than others.</p> <p>Potentially All</p>	<p>All major communities and services will be connected by the Resilient Network whether they are in rural areas or not.</p> <p>Routes chosen for the Resilient Network will ensure that all communities will only be a short distance from the Resilient Network. Most parts of the County can be accessed by alternative routes if the usual route is inaccessible. East Sussex Highways puts diversion routes in place for prolonged works and publishes details on our website.</p> <p>We will take into consideration the fact that East Sussex is a largely rural county with remote communities and key services. This means the Resilient Network will be slightly longer than average.</p>	<p>Plan is fit for purpose and either has a positive impact or no negative impact on those with protected characteristics.</p>	<p>Minimal complaints from users and stakeholders on this topic.</p>	<p>Autumn 2022. During development of plan</p>
<p>People may have difficulties in reading or understanding the</p>	<p>The Plan is written in Plain English and a summary</p>	<p>Anyone can access and understand Highways information.</p>	<p>No negative feedback or complaints around</p>	<p>On implementation of the plan and ongoing</p>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p>language in our Plan or in providing feedback.</p> <p>Disability Race/ Ethnicity Literacy/ Numeracy</p>	<p>explanation will be included on the website</p> <p>East Sussex Highways already has a variety of ways we can be contacted including phone, letter or via our website. The Contact Centre will be briefed on publication of the Plan and they can provide assistance with understanding the content of the plan or providing feedback.</p> <p>Translation or alternative texts will be provided when required.</p> <p>A map will be included with the Plan, providing a visual representation as well as a list of routes that can be read by a screen-reader.</p>		<p>Accessibility of information.</p>	
<p>(Add more rows as needed)</p>				

EqIA sign-off: (for the EqIA to be final an email must be sent from the relevant people agreeing it, or this section must be signed)

Staff member competing Equality Impact Analysis: Rosslyn Mills **Date:** 06/09/2022

Directorate Management Team rep or Head of Service: Dale Poore **Date:** 05/10/2022

Equality lead: Sarah Tighe-Ford **Date:** 28/09/2022

Guidance end-notes

¹ The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the Council must be aware of the Council's duties under the Equality Act 2010 and ensure they comply with them appropriately in their daily work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral, rigorous part of your decision-making process and influence the process.
- **Sufficient Information:** you must assess what information you have and what is further needed to give proper consideration.
- **No delegation:** the Council is responsible for ensuring that any contracted services, which are provided on its behalf need also to comply with the same legal obligations under the Equality Act of 2010. You need, therefore, to ensure that the relevant contracts make these obligations clear to the supplier. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy or service is developed/agreed, and when it is implemented and reviewed.
- **Proper Record Keeping:** to prove that the Council has fulfilled its legal obligations under the Equality Act you must keep records of the process you follow and the impacts identified.

NB: Filling out this EqIA in itself does not meet the requirements of the Council's equality duty. All the requirements above must be fulfilled, or the EqIA (and any decision based on it) may be open to challenge. An EqIA therefore can provide evidence that the Council has taken practical steps comply with its equality duty and provide a record that to demonstrate that it has done so.

² Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the actual and potential impact of our activities on people who share any of the legally 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on the nature of your project, who it might affect, those groups' vulnerability, and the seriousness of any potential impacts it might have. We use this EqIA template to gather information and assess the impact of our project in these areas.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce, minimise or eliminate any negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).

-
- **promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
 - **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

³ **EqIAs are always proportionate** to:

- The nature of the service, or scope of the policy/strategy
- The resources involved
- The number of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed service or policy on a protected group (e.g. disabled people), the more thorough and demanding our process must be so that we comply with the Equality Act of 2010.

⁴ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁵ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁶ **Focus of EqIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Analysis (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the service, policy, strategy, practice, or function?
- Who implements, carries out or delivers the service, policy, strategy, practice, or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?

- Who is affected by the service, policy, strategy, practice, or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes, or improvements, are required and what should the benefits be?
- What do existing or previous reviews of the service, policy, strategy, practice, or function indicate to you?
- What is the reason for the proposal, or change (financial, service scope, legal requirements, etc)? The Equality Act requires us to make these clear.

⁷ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write ‘not applicable’.

⁸ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?⁸
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn’t and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups / communities?

⁹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council’s duties under the Equality Act.

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

¹⁰ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council’s obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that you take decisions and make changes conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don’t exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of “the policy is likely to disadvantage older women”, say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so, the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹¹ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to address the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

¹² **Age:** People of all ages

¹³ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis. Carers of disabled people are protected within the Act by association.

¹⁴ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

¹⁵ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁶ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

¹⁷ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

¹⁸ **Sex/Gender:** Both men and women are covered under the Act.

¹⁹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²⁰ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²¹ **Community Cohesion:** potential impacts on how well people from different communities get on together. The council has a legal duty to foster good relations between groups of people who share different protected characteristics. Some actions or policies may have impacts – or perceived impacts – on how groups see one another or in terms of how the council’s resources are seen to be allocated. There may also be opportunities to positively impact on good relations between groups.

²² **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?²²
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn’t and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?

- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?

²³ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act .

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

²⁴ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that take decisions and make changes conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

²⁵ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

-
- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
 - Be specific and detailed and explain how far these actions are expected to address the negative impacts.
 - If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
 - An EqlA which has attempted to airbrush the facts is an EqlA that is vulnerable to challenge.

²⁶ **Rurality:** deprivation is experienced differently between people living in rural and urban areas. In rural areas issues can include isolation, access to services (eg: GPs, pharmacies, libraries, schools), low income / part-time work, infrequent public transport, high transport costs, lack of affordable housing and higher fuel costs. Deprivation can also be more dispersed and less visible.

²⁷ **Other groups that may be differently affected:** this may vary by services, but examples include: homeless people, substance misusers, people experiencing domestic/sexual violence, looked after children or care leavers, current or former armed forces personnel (or their families), people on the Autistic spectrum etc.

²⁸ **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

²⁹ **Action Planning:** The Council's obligation under the Equality Act of 2010 is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.