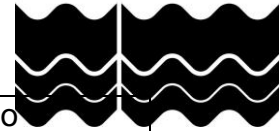


Equality Impact Analysis

Title of Project/Service/Policy¹	Household Support Fund
Team/Department²	Adult Social Care and Health (on behalf of ESCC)
Directorate	Planning, Performance and Engagement
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope³	<p>The Household Support Fund (HSF) helps eligible households with essential costs. The scheme provides an opportunity to support households with children, households with pensioners, households with a disabled person and other vulnerable households within East Sussex who are experiencing financial challenges.</p> <p>Payments are made in instalments in arrears after the submission of an interim Management Information (MI) return and the final MI return at the end of grant period after the DWP have verified the MI.</p> <p>The criteria for Household Support Fund is updated for each round but has broadly been the same in recent years:</p> <ul style="list-style-type: none"> • Beneficiary groups are households with children, households with pensioners, households with a disabled person and other vulnerable households. Unpaid carers are also included in this round, as a group that Local Authorities should try to reach. However, there will no longer be ring fencing of support for specific beneficiary groups (previously funds were ring fenced for households with vulnerable children in HSF 1 and households with children and households with pensioners in HSF 2). • There is an emphasis on providing support to households that are in the most need – particularly those who may not be eligible for the other support that the government has recently made available, including the Cost of Living Payments set out on 26 May 2022, energy support scheme detailed on 29 July and the Council tax rebate. The



Government expects residents to be able to contact authorities to enquire as to eligibility.

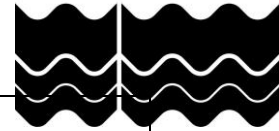
- The type of eligible spending will remain the same - that is helping households with everyday essentials, including food, water, energy bills and, in exceptional cases, with housing costs. The exception is the inclusion of the provision of advice services which has become eligible for funding under this scheme. The guidance highlights that energy needs might be of particular concern and that *“Local Authorities should prioritise supporting households with the cost of energy.” G*

Government guidance highlights that Energy bills may be of particular concern to low income households during the period of The Fund and Authorities should prioritise supporting households with the cost of energy. Support which can make a quick but sustainable impact on energy costs is particularly encouraged; for example, the insulation of hot water tanks, fitting draft excluders to a door, or replacing inefficient lightbulbs or white goods. The Fund can also be used to support households with the cost of food and water bills, essential costs related to energy, food and water, and with wider essential costs. The Fund can additionally be used to support housing costs where existing housing support schemes do not meet this need.

The guidance also indicates that at least part of the spending should be application based, i.e. that residents should have the opportunity to request support. The definition is flexible, and applications can be made directly via the authority or via third parties. There is no qualifying limit indicated in the draft guidance.

In line with how East Sussex has distributed the previous Household Support Funds, we are proposing to allocate funding in the following ways:

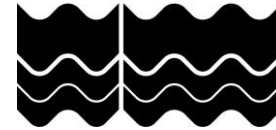
- Food vouchers for 2-19 year olds eligible for Free School Meals, to cover the school holiday periods
- Children’s Services teams that provide support to vulnerable families and children administered funding directly to these to meet identified needs



- Allocations to VCSEs to target individuals, including pensioners, and people with disabilities at risk of food and fuel poverty through using existing referral mechanisms with established criteria
- Allocations to each of the 5 Districts and Boroughs (D+Bs) to administer funding to adults, including pensioners, in need through a web based application scheme to those who meet the eligibility criteria, particularly those on council and social housing registers
- Allocation to Food Banks and Food Partnerships to distribute to those in need

The scheme as a whole will be assessed from an equality perspective. The ESCC scheme should be explicitly looking to support marginalised groups who may not already be supported by the statutory sector.

In Household Support Fund guidance has highlighted a particular focus on providing support to households with people with disabilities and to support unpaid carers



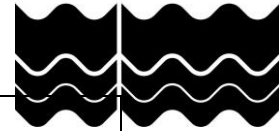
Initial assessment of whether your project requires an EqlA

	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?	X		
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?	X		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	X		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?		X	
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 ?			X
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?			X
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?	X		

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 EqlA will depend on:

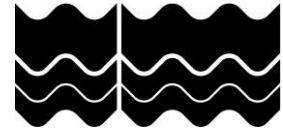
- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.



Low risk	Medium risk	High risk

1. Update on previous EqIAs and outcomes of previous actions (if applicable)⁴

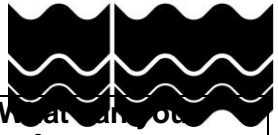
What actions did you plan last time? (List them from the previous EqIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
The EQIA for Household Support Fund has been based upon the previous Household Support Fund 3 EQIA.	All actions have been updated and have been reviewed November 2023.	No further actions as at November 2023



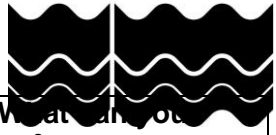
1. Review of information, equality analysis and potential actions

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

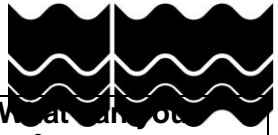
Protected characteristics groups under the Equality Act 2010	What do you know⁵ Summary of data about your service-users and/or staff	What do people tell you⁶? Summary of service-user and/or staff feedback	What does this mean⁷? Impacts identified from data and feedback (actual and potential)	What can you do⁸? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age⁹	<p>The ASCH Equalities Dashboard provides data in relation to all clients receiving Long Term Support following an assessment of need. As of 30th September 2021, of a total of 6869 ASC clients, age distribution was:</p> <p>18-64: 41% 65-74: 13% 75-84: 20% Over 95: 5%</p> <p>The results of the 2021 census suggest that at 545,800, the population of East Sussex is around 3.2% smaller than anticipated, and close to the 2015 mid-year estimate of 545,021.</p> <ul style="list-style-type: none"> • Proportion of population aged 65 and over rose from 22.7% in 2011 to 26.1% in 2021 	<p>In response to Adult Social Care’s client feedback survey Listening to You (March 2021) 57% of clients said their preferred method of contact is telephone, compared to just 15% who said on line. Thirty five per cent of clients said they would be unlikely to set up an on line account in relation to their care, compared to 20% who said they would be likely to.</p>	<p>The proposal will have a positive impact on younger people/people with young families as the grant will be directed towards those receiving free school meals and families with children.</p> <p>The proposal could have a negative impact upon those who do not have access to the internet nor an email account.</p>	<p>ESCC will distribute the fund via District and Borough Councils and via VCSEs and introduce an application process.</p> <p>Citizens Advice Bureau and Warm Home Check Service who provide support around fuel poverty are amongst the VCSEs we are working with.</p>



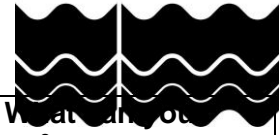
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	<ul style="list-style-type: none"> • Proportion of people under the age of 20 fell from 22.1% in 2011 to 20.5% in 2021 Median age was 48 in 2021, compared to 40 in England as a whole • 2nd highest proportion of over-85s in England • 4th highest proportion of veterans in the South East (but most are old enough to have done National Service) <div data-bbox="421 916 1075 1075" style="text-align: center;"> <p>Proportion of population by age</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Age Group</th> <th>Proportion</th> </tr> </thead> <tbody> <tr> <td>0-24</td> <td>25%</td> </tr> <tr> <td>25-44</td> <td>21%</td> </tr> <tr> <td>45-64</td> <td>28%</td> </tr> <tr> <td>65 and over</td> <td>26%</td> </tr> </tbody> </table> </div> <p>The Income Deprivation Affecting Older People Index (IDAOPi) measures the proportion of those aged 60 and over who experience income deprivation. One third (105) of</p>	Age Group	Proportion	0-24	25%	25-44	21%	45-64	28%	65 and over	26%			<p>Free School Meals and Childrens services allocation will ensure that HSF is appropriately targeted. CSD</p> <p>The application process will take digital exclusion into account and ensure there is an alternative to online applications. District and Borough and VCSE partners have taken steps to mitigate this providing telephone numbers and open days to</p>
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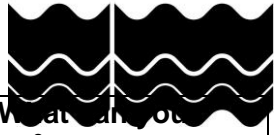
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	<p>LSOAs in the county have a higher proportion of older people experiencing income deprivation than the national average (14.2%).</p> <p>All of the deprived LSOAs are in Hastings except one in Devonshire ward, Eastbourne; Approximately 19,500 or 11% of older people are affected by income deprivation in the county, this is higher than the regional average of 10%, but lower than England as a whole (14%).</p> <p>However, there is much variation within the county. 1 in 5 older people in Hastings are affected by income deprivation compared to less than 1 in 10 in Wealden.</p> <p>The neighbourhoods with the highest levels of older people's deprivation in the county are in Hastings where almost half of all older people are living in income deprivation.</p> <p>According to ONS research, over 10% of the population do not use the internet, 75% of that group are aged over 65.</p> <p>The number of pupils in East Sussex schools according to the January 2021 school census is 67,617.</p>			<p>assist with form filling.</p> <p>ESCC include information on HSF 4 allocations on the ESCC Cost of living webpage Information on the application process and eligibility criteria is included on all District and Borough Websites</p> <p>Information about HSF has been provided in the ASC Provider Bulletin, and winter readiness ASCH newsletter</p>



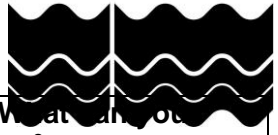
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	<p>We currently have 13,862 Children eligible for Free School Meals (FSM), 20% of the total population:</p> <ul style="list-style-type: none"> • 52% of our FSM children are Boys (7211) & 48% Girls (6651) • 27% of our FSM children are in the Hastings area (3720), 23% Eastbourne (3164), 18% Wealden (2462), 17% Rother (2291) & 16% Lewes (2225). • FSM children make up 33% of the total population in Hastings, 23% Eastbourne, 20% Rother, 18% Lewes & 13% Wealden. • 84% of our FSM children are classified as White British (11,605), 4% White Other (409), 2% Mixed Other (320) and the other ethnic groups are less than 1% 			<p>ESCC Libraries has offered the assistance of their IT 4U volunteers to assist pensioners in completing D&B on-line forms. The team of volunteers can provide 1:1 sessions at 14 libraries across the county.</p> <p>Eastbourne held 'Form-Filling Fridays' - a partnership, drop-in day at the town hall. It was advertised on social media, via leaflets and word of mouth. CAB were present as well as</p>



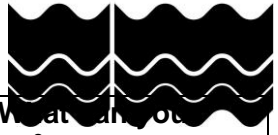
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				<p>other parts of the authority.</p> <p>Age UK East Sussex and Eastbourne Age Concern are amongst the VCSE groups who administer HSF applications offering digital, phone or paper based applications.</p>
<p>Disability¹⁰</p>	<p>The cost of living pressures have reinforced the focus on health inequalities, with gaps in healthy life expectancy a particular priority for some areas. The</p> <p>Given that disabled people tend to have lower incomes than non-disabled people, then we would expect the cost of living crisis to have more of an impact on them</p>		<p>Those with a disability are more likely to be unemployed or in poverty so more likely to be in need of HSF assistance.</p> <p>Authorities should also consider providing support to disabled</p>	<p>We are working with VCSE organisations who work particularly with those with disabilities (Amaze)</p> <p>The financial Inclusion team</p>



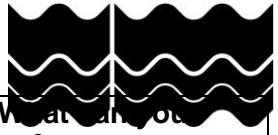
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	<p>Costly differences Living standards for working-age people with disabilities – Resolution foundation Briefing Omar El Dessouky & Charlie McCurdy January 2023</p> <p>This report has shown that the living standards of disabled people are significantly lower than the non-disabled population and, even before the cost of living crisis, a far higher share of disabled people reported living in materially deprived households than people without disabilities.</p> <p>This report has shown that people with disabilities are already cutting back on energy use and the amount they spend on food this winter, by a greater degree than those without disabilities. People with disabilities are more likely to be worried about the cost of essentials and to say that the crisis is making their health worse</p> <p>We focus on people with disabilities for two good reasons. First, self-reported disability is on the rise in Britain. The</p>		<p>people in their area. Disabled people in particular may be facing acute challenges due to the disproportionate impact that rising costs bring for the additional services they need in order to manage their conditions, remain independent and avoid becoming socially isolated. For example, some disabled people may have increased utility bills due to the usage of equipment, aids or adaptations associated with their disability.</p>	<p>have regular attendance at Disability Rights reference Group (DRRG) & the Inclusion Advisory Group (IAG) attended by VCSEs as part of the programmes engagement and consultation</p> <p>Information about accessing the funds will be available in a range of formats - including easy read</p>



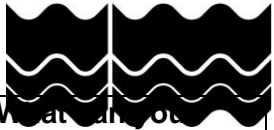
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	<p>share of working-age people who report a disability has risen from 17 to 23 per cent since 2013, a rise of over 2.6 million people.</p> <p>Second, people with disabilities are more vulnerable to rising costs of essentials because energy and food make up a greater share of their budgets, on average, than for the non-disabled, in part because of additional needs caused by underlying health problems.</p> <ul style="list-style-type: none"> ○ Disabled people – and the households they live in – may be more vulnerable to rising costs, particularly of essentials. This is partly because they already face additional cost, including, for example, specialist equipment and home adaptations, extra transport costs, medication, insurance and therapies. ○ Data from the ONS shows that energy and food make up a disproportionate share of spending for disabled households 			



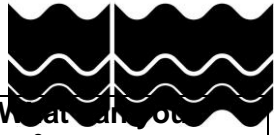
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	<p>In the case of energy, this is partly because many disabled people say they need more heating to stay warm (for example, if they lack in mobility), and others use extra electricity to charge specialist equipment.</p> <p>According to research by the Equality and Human Rights Commission: 48% of Disabled adults are in employment compared to 79% non disabled adults In England 2015/16, the employment rate was lowest for people with 'learning difficulties or disabilities' (20.5%) In 2012/13, 24.% of disabled people were in poverty compared with 18.0% who were not disabled.</p> <p>Evidence from the Fuel Poverty Advisory Group to the House of Commons Energy and Climate Change Committee (2013) indicated that nearly 34% of 'fuel-poor' households contained someone with a disability or long-term condition.</p> <p>Census 2021: BSL Language</p>			<p>Financial Inclusion team to review BSL accessibility and audio to support accessibility for</p>



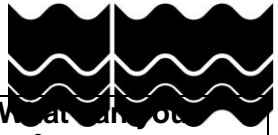
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	<ul style="list-style-type: none"> • British Sign Language (BSL) was the main language* of 160 (0.03%) usual residents aged three years and over in East Sussex. • This is consistent with the average across the whole of the South East (0.03%) and only marginally lower than the average across the whole of England (0.04%). • The number of BSL users across the county is thought to be considerably higher as these figures do not include professional BSL users, Interpreters, Translators etc, and only refer to those whose main language is BSL. <p>Census 2021 Disability:</p> <ul style="list-style-type: none"> • 34.8% of households (83,640) in East Sussex had at least one member identifying as disabled under the Equality Act in 2021. • 7.3% (17,520) of East Sussex households had two or more members identifying as disabled. 			<p>visual and hearing impairment on both ESCC and D&B websites</p>



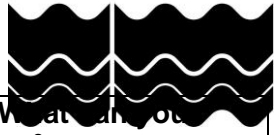
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	<ul style="list-style-type: none"> • Of those identifying as disabled, 38.8% (45,190) said their disability affected their day-to-day activities “a lot”. 			



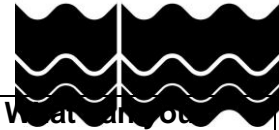
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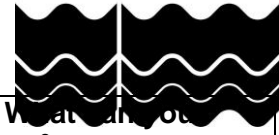
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<p>Gender reassignment¹¹</p>	<p>This data is not recorded within LAS. In the 436 “About You” forms received as part of the Listening To You surveys carried out between March and November 2020, 352 people answered the question “Do you identify as a transgender or trans person”, with the following results: 98.3% said no, 0.6% said yes, and 1.1% preferred not to say.</p> <table border="1"> <thead> <tr> <th>Gender Identity</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Gender identity the same as sex registered at birth</td> <td>428,410</td> <td>94.0%</td> </tr> <tr> <td>Not answered</td> <td>25,589</td> <td>5.6%</td> </tr> <tr> <td>Gender identity different from sex registered at birth</td> <td>1,640</td> <td>0.4%</td> </tr> <tr> <td>Gender identity different from sex registered at birth but no specific identity given</td> <td>561</td> <td>0.12%</td> </tr> <tr> <td>Trans woman</td> <td>332</td> <td>0.07%</td> </tr> <tr> <td>Trans man</td> <td>309</td> <td>0.07%</td> </tr> <tr> <td>Non-binary</td> <td>279</td> <td>0.06%</td> </tr> <tr> <td>All other gender identities</td> <td>159</td> <td>0.03%</td> </tr> </tbody> </table>	Gender Identity	Count	Percentage	Gender identity the same as sex registered at birth	428,410	94.0%	Not answered	25,589	5.6%	Gender identity different from sex registered at birth	1,640	0.4%	Gender identity different from sex registered at birth but no specific identity given	561	0.12%	Trans woman	332	0.07%	Trans man	309	0.07%	Non-binary	279	0.06%	All other gender identities	159	0.03%			
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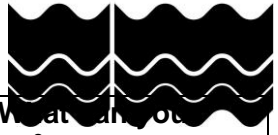
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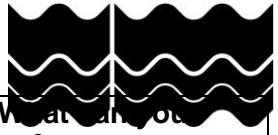
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<p>Pregnancy and maternity¹²</p>	<p>There are just under 5,000 births per year in East Sussex. Hastings has the highest overall birth rate as well as for women aged 15-19 years. Lewes and then Rother have the highest birth rates for women aged 35-44 years. Pregnancy means an increase in expenditure on essential items for babies.</p>		<p>Single parent household will experience higher living costs and potential to be living on lower incomes</p>	
<p>Race/ethnicity¹³ Including migrants, refugees and asylum seekers</p>	<p>Based on the 2011 Census 92% of the adult population of East Sussex were White British; 4.6% were of another white background; 1.6% were Asian/ Asian British, 0.5% were Black/ Black British and 1.3.% were from other ethnic backgrounds.</p> <p>96% of households in East Sussex have all members aged 16 and over with English as a main language, higher than regionally (93%) and nationally (91%). About 1.8% of all households in the county have no people in the household with English as a main language, compared to 4.3% in England and Wales and 3.1% in the South East. According to the 2021 School census, the most common languages other than English amongst pupils are Polish, Portuguese, Arabic, Romanian and Russian.</p>			<p>Information about accessing the Household support funds can be made available in other languages. The ESCC cost of living webpage has been updated to include a translation statement for 11 languages which signposts to language and information support</p>



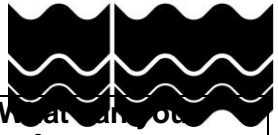
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	<p>The Equality and Human Rights Commission produce a 5 yearly report into equality in Britain. In relation to race:</p> <ul style="list-style-type: none"> • People from ethnic minorities are twice as likely to live in poverty compared to White people across Britain. People from ethnic minorities have disproportionately high unemployment rates • Across Great Britain, Black and Asian workers are also moving into more insecure forms of employment at higher rates than White workers. Black and Asian workers were more than twice as likely to be in agency work in 2014 • Gypsy and Irish Travellers had the lowest levels of economic activity in England and Wales (47% compared with 63% for all England and Wales) Just over half of Gypsies and Travellers in England, Wales and Scotland were economically inactive. • Black and Asian workers are moving into more insecure forms of employment at higher rates than White workers. They were twice as likely (4.3%) to be in involuntary temporary employment compared with 			<p>and access to translation and interpreting services are available.</p>



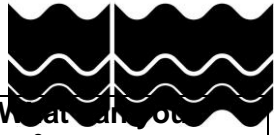
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	<p>White workers (2.1%). They are more than twice as likely to be in agency work.</p> <p>2021 Census</p> <ul style="list-style-type: none"> • 93.9% (512,440) of East Sussex residents identified their ethnic group within the high-level "White" category in 2021, down from 96.0% (505,420) in 2011. • This is significantly higher than both the South East regional and the English national averages of 86.3% and 81.0%. respectively. 			



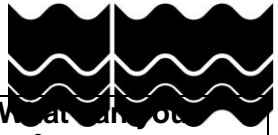
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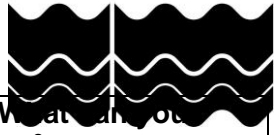
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	<ul style="list-style-type: none"> • 3.7% of East Sussex residents aged three years and over cited a language other than English as their main language in 2021. • The most common main languages in 2021 were: <ul style="list-style-type: none"> <input type="checkbox"/> Polish (0.4%, 2,380) <input type="checkbox"/> Romanian (0.4%, 2,020) <input type="checkbox"/> Portuguese (0.3%, 1,390) <input type="checkbox"/> Spanish (0.2%, 1,090). <p>Language proficiency</p> <ul style="list-style-type: none"> • 51.5% (10,800) of the 16,610 residents whose main language is not English said they can speak English very well • 34.0% (6,670) said they can speak English well • 12.2% (2,400) said they cannot speak English well • 2.2% (430 residents) said they cannot speak English at all 			



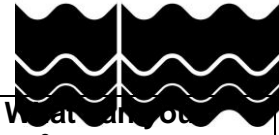
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<p>Religion or belief¹⁴</p>	<ul style="list-style-type: none"> • 93.5% of usual residents answered the question in 2021, an increase from 91.9% in 2011 • The number of people stating that they have no religion in East Sussex increased to 244,050 (44.7%) from 155,720 (29.6%) in 2011. • This is higher than the English national average, where 36.7% of usual residents stated they had no religion in 2021, up from 24.7% in 2011. <div data-bbox="392 938 1048 1268" data-label="Figure"> <table border="1"> <caption>Religious composition of East Sussex in 2021 versus 2011</caption> <thead> <tr> <th>Year</th> <th>Christian</th> <th>Other religion</th> <th>No religion</th> <th>Not answered</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>~58%</td> <td>~2%</td> <td>~30%</td> <td>~10%</td> </tr> <tr> <td>2021</td> <td>~45%</td> <td>~2%</td> <td>~45%</td> <td>~8%</td> </tr> </tbody> </table> </div>	Year	Christian	Other religion	No religion	Not answered	2011	~58%	~2%	~30%	~10%	2021	~45%	~2%	~45%	~8%			<p>The Financial Inclusion team will consider opportunities to raise awareness re applying for funds through places of worship.</p>
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<p>Sex/Gender¹⁵</p>	<p>2011 census data tells us that 52% of the population of East Sussex is female and 48% male.</p> <p>As cited in the Socio-Economic/ Human Rights Impacts section, women / mothers are disproportionately impacted across a number of policy areas including access to work and caring responsibilities Women are disadvantaged in the formal labour market by a combination of employment in low pay, low profile, low</p>															

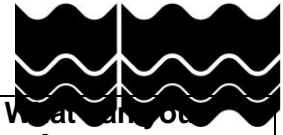


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	<p>progression industries and the impact of caring on time and availability for paid work. Relative poverty rates are also highest for single women with children, although this gap is shrinking. These issues are large scale and generational. Women are more likely to face adverse socio-economic impacts due to the COVID-19 pandemic. The impacts of this pandemic relate to the numerous roles traditionally occupied by women. For example, women are more likely to be employed in roles that were considered ‘essential’, often care-taking roles. Research has shown the increased exposure to COVID-19, especially by those women in social and healthcare environments, has presented an additional psychological burden. Women are also more likely to occupy sectors where unemployment has been on the increase during the pandemic meaning they are more likely to face economic insecurity.</p> <p>Women primarily carry out familial caring roles and as the country went into lockdown, women were often faced with the extra burden of increased childcare and caring for older family members on top of existing responsibilities</p> <p>According to research by Turn2Us, an estimated 15 million people (28%) in the UK have experienced at least one</p>			

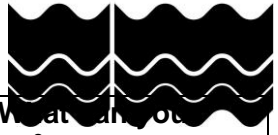


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	<p>life event that was either ‘very difficult’ or ‘not possible’ to pay for, using existing income and savings, during the past two years.¹</p> <p>Women, younger people and people from ethnic minorities reported being more likely to experience a life event that has a negative impact on their finances. After a life event that left them worse off, almost 50% of people relied on a credit card to cover day-to day-spending, 23% took out a payday loan; and more than one third (36%) missed bills or debt repayments</p> <p>Census 2021 Female 283,700 (52%) Male 262,147 (48%)</p> <p>Of the population aged 16+: 94.0% stated that their gender identity was the same as their sex registered at birth (93.5% England) 5.6% didn’t answer the question (6.0% England)</p> <p>0.4% (1,640 people) indicated that their gender identity was different from their sex registered at birth, (0.5% England)</p>			

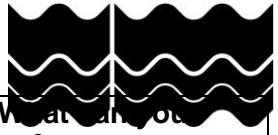
¹ [Life events and financial insecurity](#), Turn2Us (2021)



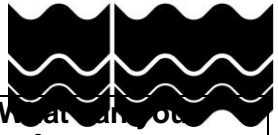
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<p>Sexual orientation¹⁶</p>	<p>Between November 2019 and February 2020, a community survey questionnaire was sent out to 42,315 addresses in East Sussex. People were invited to respond to a number of questions, including how they would describe their sexual orientation. Of the 12,892 people who responded 93% identified as heterosexual and 4% as LGBT. A further 4% stated that none of the survey options applied to them. Research by Stonewall (2010) suggests that older LGB people may be more reliant on ASC services as a result of more limited familial support networks.</p> <p>The National Institute of Economic and Social Research found that heteronormative assumptions as well as experiences and/or fears of discrimination prevent LGB&T people from accessing mainstream services. For this reason, LGB&T people have a preference for and are more engaged with specialist LGB&T organisations. There is some evidence that LGB&T people may be</p>			<p>The financial inclusion team will consider how VCSEs operating the HSF support LGBT communities to raise awareness about the fund.</p>



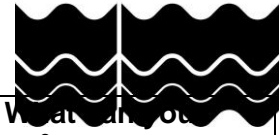
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	<p>disproportionately negatively affected by spending cuts on voluntary and community sector (VCS) services</p> <p>There is some evidence that LGB&T people may be disproportionately negatively affected by spending cuts on voluntary and community sector (VCS) services</p> <p>Of the population aged 16+: 7.5% didn't answer the question 89.2% identified as straight or heterosexual (89.4% England) 3.3% identified with an LGB+ orientation ("Gay or Lesbian", "Bisexual" or "Other sexual orientation (3.2% in England)</p>			



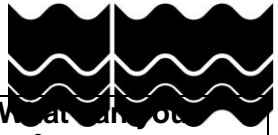
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	<p>1 in 14 (7%) females aged 16-44 identified as LGB+ in East Sussex in 2021, compared to 1 in 25 (4%) men In other words, females accounted for 65% of all residents under the age of 45 who identified as LGB+, but only 43% of those aged 45 and over</p>			



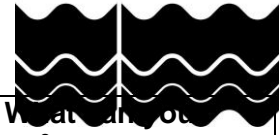
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	<p style="text-align: center;">Number of residents identifying as LGB+ by sex</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Age Group</th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>Under 45s</td> <td>5,825 (7.1%)</td> <td>3,195 (4.1%)</td> </tr> <tr> <td>45 years and above</td> <td>2,630 (1.7%)</td> <td>3,550 (2.6%)</td> </tr> </tbody> </table>	Age Group	Female	Male	Under 45s	5,825 (7.1%)	3,195 (4.1%)	45 years and above	2,630 (1.7%)	3,550 (2.6%)			
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<p>Marriage and civil partnership¹⁷</p>	<p>According to 2011 census data for East Sussex: Single 29% Married 48% Civil Partnership 0.3% Separated 3% Divorced 11% Widowed 9%</p> <p>The county has a higher proportion of married people (48%) and those who are registered in a same-sex civil partnership (0.3%), than the national and regional averages.</p> <p>There are about 14,000 households with a lone parent with dependent children in East Sussex which represent 6% of all households, an increase from 5% in 2001. This is slightly lower than the national average (7%).</p>												



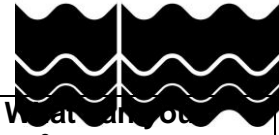
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	<p>Census 2021</p> <ul style="list-style-type: none"> • Of the 211,810 residents who were married in 2021, 2,000 (0.4% of all residents aged 16+) were in a same-sex marriage. • A further 1,270 (0.3%) were in same-sex civil partnerships. • 31.9% of residents aged 16+ in East Sussex in 2021 had never been married or civil partnered, up from 24.6% in 2001. • People from “mixed and multiple” backgrounds had the highest proportions of never married or civil partnered (57%), while Asian or Asian British had the lowest (26%). 			



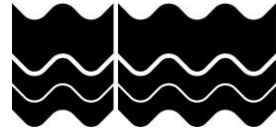
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	<div data-bbox="347 571 1019 1300" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Legal partnership status of residents aged 16+ in East Sussex</p> <table border="1" style="margin-top: 10px; width: 100%; border-collapse: collapse;"> <caption>Estimated data from the line graph</caption> <thead> <tr> <th>Year</th> <th>Married/civil partnered (%)</th> <th>Never married/civil partnered (%)</th> <th>Divorced/civil partnership dissolved (%)</th> </tr> </thead> <tbody> <tr> <td>1991</td> <td>60</td> <td>23</td> <td>7</td> </tr> <tr> <td>2001</td> <td>55</td> <td>25</td> <td>9</td> </tr> <tr> <td>2011</td> <td>51</td> <td>29</td> <td>10</td> </tr> <tr> <td>2021</td> <td>49</td> <td>32</td> <td>11</td> </tr> </tbody> </table> </div>	Year	Married/civil partnered (%)	Never married/civil partnered (%)	Divorced/civil partnership dissolved (%)	1991	60	23	7	2001	55	25	9	2011	51	29	10	2021	49	32	11			
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<p>Digital Exclusion</p>	<p>Rother DC Direct letters were sent out to potentially eligible residents. Please see the attached example. <i>(Social media and weekly newsletter were used to promote the scheme 2023 , but HSF website and letters)</i></p> <p>Eastbourne BC discussed at Cost of Living Working Groups attended by the CAB and we held Open Days where people could come along and get advice and help form filling.</p> <p>Lewes DC This was discussed at Cost of Living Working Groups attended by the CAB and we held Open Days where people could come along and get advice and help form filling.</p> <p>Hastings BC HSF is promoted online on the council’s website. Additionally, all households identified as eligible via our system have been written to advise of them of their eligibility and, where required, to encourage and invite them to make an application to the fund.</p>			



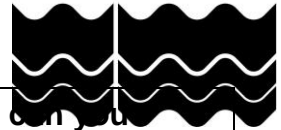
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	<p>Wealden DC Have run take up days where we have helped people to apply for the HSF scheme (amongst other benefits too). These take up days have been held at our Council offices and also at retirement courts in Westham, Hailsham, Polegate and at various other venues in Uckfield, Heathfield, Waldron, Pevensey Bay, Crowborough and Hellingly. Posters and a newsletter that gets sent to our Council Tenants and the HSF scheme is promoted within that.</p>			
<p>Impacts on community cohesion¹⁸</p>	<p>The HSF should have positive impact on community cohesion as more people will be able to get the financial support needed.</p>			



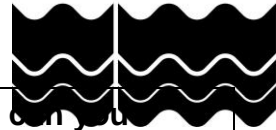
Additional categories

(identified locally as potentially causing / worsening inequality)

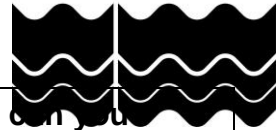
Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?
<p>Rurality²³</p>	<p>73.7% of the population in East Sussex lives in an urban area, with the remaining 26.3% living in a rural area.</p> <p>All 22 of the county's most deprived areas are located in urban areas so there is no significant statistical link between rurality and poverty in East Sussex.</p> <p>Where people live makes a massive difference - many people in rural areas can't physically access services as there is a lack of local presence in terms of Jobcentres, children's centres etc. It was highlighted that there is no Jobcentre in Wealden.</p> <p>Many people on a low income lack the funds to run a car, but public transport options are limited, and often perceived as unreliable and expensive. This lack of connectivity affects their ability to find accessible work and to access services.</p> <p>Many of the more rural homes are not connected to the gas grid and so are heated using oil.</p> <p>Homeowners can only buy a full tank of oil at a time, which with the rise in energy costs has risen to approximately £800. In Rother, this applies to 60% of homes.</p>		<p>Those in rural areas and or without access to transport may not be able to easily access the larger supermarkets where Huggg vouchers are redeemable.</p>	<p>It does not provide value for money to allow the vouchers to be spent in small shops however they can be spent online with most of the supermarkets involved .</p>



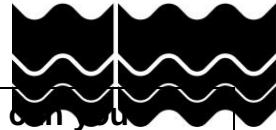
Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?												
<p>Carers</p>	<p>Census 2021</p> <p>An estimated 61,050 East Sussex residents (11.7%) aged 5 years and over provided unpaid care in 2021, compared to 59,410 (11.9%) in 2011. The proportion of the population aged 5+ providing 19 hours or less of unpaid care per week fell from 7.5% in 2011 to 5.0% in 2021, while the proportion providing 20 hours or more rose from 3.8% to 4.9%.</p> <p style="text-align: center;">Number of hours of unpaid care provided per week by residents aged 5 years and over in 2011 and 2021</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Hours of care</th> <th>2011 (%)</th> <th>2021 (%)</th> </tr> </thead> <tbody> <tr> <td>19 hours or less</td> <td>7.5%</td> <td>5.0%</td> </tr> <tr> <td>20 to 49 hours</td> <td>1.3%</td> <td>1.9%</td> </tr> <tr> <td>50 hours or more</td> <td>2.5%</td> <td>3.0%</td> </tr> </tbody> </table> <p>Carer's Allowance (CA) is paid to carers who care for someone for at least 35 hours a week where the cared for person receives certain benefits.</p>	Hours of care	2011 (%)	2021 (%)	19 hours or less	7.5%	5.0%	20 to 49 hours	1.3%	1.9%	50 hours or more	2.5%	3.0%	<p>People with caring responsibilities may be facing acute challenges incurred through their fulfilling these responsibilities for vulnerable citizens due to the disproportionate impact that rising costs may bring for the additional services they need. For example, they may have additional heating, water or transport costs.</p>	<p>Authorities should also consider providing support to people with caring responsibilities in their area. Authorities are therefore encouraged to explore ways in which this group may be supported.</p>	<p>We are working with third party organisations (Amaze, Age-UK etc) who support carers.</p>
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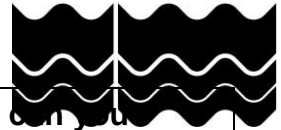
Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?
	<p>There are over 10,000 persons claiming CA in East Sussex. (Source DWP Feb 2020)</p> <p>In 2020, it is estimated that there are over 68,000 carers in East Sussex. A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21stCentury Families and Communities, 2008]</p> <p>Research by the New Policy Institute found that the poverty rate among carers increases with the number of hours that they are caring. There is a particularly sharp increase in the poverty rate at 20 hours. People who care for 20 to 49 hours per week have a poverty rate of 35% and those who care for 50 or more hours have a poverty rate of 38% (rate amongst non-carers is 20%).</p>			
Deprivation	<p>The Index of Multiple Deprivation 2019 is the official measure of relative deprivation for small areas in England. It combines information from seven indices (such as income, housing and health,). The areas used are called Lower-layer Super Output Areas (LSOAs), of which there are 32,844 in England. East Sussex has 22 neighbourhoods out of 329 (6.7%) in the most deprived decile. Two LSOAs are amongst the most deprived 1% in the country. Both are in Hastings (Baird and Tressell</p>		<p>The proposal could have a negative impact upon those who do not have access to the internet, smartphone, etc. In particular, printable vouchers should be made available</p>	<p>The VCSEs we are working with are based in those most deprived areas identified by the data e.g. some in Hastings and Heart of Sidley.</p> <p>Alternatives to online information, application</p>



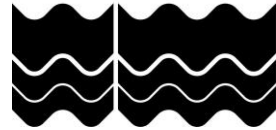
Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?
	<p>wards). Another eight are among the most deprived 5% of LSOAs, all of which are also in Hastings except one - Sidley in Bexhill. Relative deprivation appears to have increased in Eastbourne since 2015, the most deprived LSOA in Eastbourne is Hampden Park ward.</p> <p>The Income Deprivation Affecting Children Index (IDACI) measures the proportion of children aged 0-15 living in income deprived families. 19 LSOAs in East Sussex fall in to the most deprived 10% nationally for the IDACI, with 13 in Hastings, four in Eastbourne and one each in Lewes and Rother. IDACI in Hastings is the second worst in the South East. Approximately 15,000 or 16% children are affected by income deprivation in the county; this is higher than the regional average of 12% but lower than the average for England as a whole (20%). However, there is a much variation within the county. More than a quarter (27%) of children in Hastings are living in families affected by income deprivation compared to 1 in 10 in Wealden. Up to 65% of children within Tressell ward in Hastings are living in families affected by income deprivation; 30% (101) of LSOAs in the county have a higher proportion of children living in income deprived families than the national average.</p> <p>Income deprivation affects 12% (64,900) of people in the county compared to 9% regionally and 10% (28,600) of the working age population experience employment deprivation. This is higher</p>			<p>process and vouchers to be made available by VCSE organisations.</p>



Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?
	<p>than the South East region but equal to England as a whole.</p> <p>The Income Deprivation Affecting Older People Index (IDAOPI) measures the proportion of those aged 60 and over who experience income deprivation. One third (105) of LSOAs in the county have a higher proportion of older people experiencing income deprivation than the national average (14.2%). All of the deprived LSOAs are in Hastings except one in Devonshire ward, Eastbourne; Approximately 19,500 or 11% of older people are affected by income deprivation in the county, this is higher than the regional average of 10%, but lower than England as a whole (14%). However, there is much variation within the county. 1 in 5 older people in Hastings are affected by income deprivation compared to less than 1 in 10 in Wealden. The neighbourhoods with the highest levels of older people’s deprivation in the county are in Hastings where almost half of all older people are living in income deprivation.</p>			
<p>Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note)²⁴</p>	<p>Homeless, ex and at risk offenders and those with addictions.</p>			<p>The VCSEs we are working with include those who support the homeless, ex and at risk offenders and those with addictions.</p>
<p>Assessment of overall impacts and any further recommendations²⁵ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)</p>				

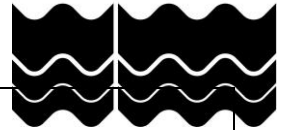


Characteristic	What do you know ¹⁹ ?	What do people tell you ²⁰ ?	What does this mean ²¹ ?	What can you do ²² ?
<p>Overall, the Household Support Fund should have a positive impact on all residents of East Sussex as it will provide financial assistance to people who need it most. ESCC want to make sure that the communication regarding this fund is shared widely and in various formats to make it accessible.</p>				

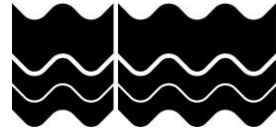


2. List detailed data and/or community feedback that informed your EqIA

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 Census Equality Data and Tools and slides	19.05.23		
The inequality of poverty: exploring the link between the poverty premium and protected characteristics, Fair By Design, February 2021	February 2021		
'The Inequality of Poverty' Exploring the link between the poverty premium and protected characteristics, University of Bristol, February 2021	February 2021		
Costly differences Living standards for working-age people with disabilities – Resolution foundation Briefing, Omar El Dessouky & Charlie McCurdy, January 2023	January 2023		
Public Health annual report 2023: Supporting communities in difficult times Local Government Association	December 2022		



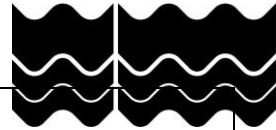
Healthwatch England Report	March 2023		
Seldom Heard report ASCH	September 2023		
LGBTQ Needs Assessment Public Health	JSNAA 2021		



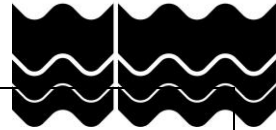
4. Prioritised Action Plan²⁶

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
Equalities monitoring	<p>Equality data will be requested from those receiving the fund. The monitoring form has been updated to improve data quality. However the equalities form is currently only optional and only completed by some VCSE organisations. The only mechanism for D&B to check this is retrospectively through a selective survey of applicants</p> <p>Food banks have not previously supplied this data due to capacity issues</p>	<p>Currently Optional monitoring allows only part analysis of the equality impact of the scheme and to assist in planning future similar funds.</p> <p>Review how to improve equalities monitoring January 2024 as part of future plans for further funds evaluation</p> <p>Could consider training offer for organisations/staff/volunteers around equalities monitoring (and collection of this data) to improved confidence and motivation to collect such data.</p>	Data quality	<p>From April 2023</p> <p>Review for future in January -March 2024</p>



Age	Districts and Boroughs have reduced the documentation required to upload to make the process easier.	Improved accessibility of the D&B application process. Also D&B awards are also made automatically with no need to submit an application.	Improved accessibility of the D&B application process	From April 2023
Disability	Information is available in different formats Financial Inclusion team to consider BSL accessibility and audio to support accessibility for visual and hearing impairment on both ESCC and D&B websites	Accessible information	Uptake of accessible information	Future action: Review how to improve accessibility as part of HSF evaluation for any future funding scheme March 2024
Ethnicity / Race	Cost of living webpage to be updated to include access to 11 other languages and to ensure	Accessible information	Uptake of translation and interpreting support	Updated and available from July 2023
Ethnicity / Race	Identify which VCSE organisations work with ethnic communities and consider how to make information available to identified ethnic communities	Improved knowledge of HSF and Accessible information	Increased number of applications from people from ethnic communities	Future Action: Review as part of HSF evaluation March 2024
Religion	The financial inclusion team will consider way to make information about HSF funding available in places of worship	Improved knowledge of HSF	Increased number of eligible applications from people from diverse religious	Future Action: Review as part of HSF evaluation March 2024



Sexual Orientation	The financial inclusion team will consider how VCSEs operating the HSF support LGBT communities to raise awareness about the fund.	Improved knowledge of HSF	Increased number of applications from people from LGBT communities	Review as part of HSF evaluation in March 2024
Carers	VCSE partners to support awards to unpaid carers Wealden DC extended its eligibility to extend application-based awards to unpaid carers.	Unpaid carers able to access the fund	Increased number of unpaid carers accessing the fund	From April 2023
Digital Exclusion	Information, vouchers, application process, etc not limited to on-line.	Alternatives to on line made available. District and Borough Councils have agreed to get the information about the fund printed and for it to be shared widely. Non digital promotion is facilitated through local cost of living groups.	Uptake of alternatives	From April 2023

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

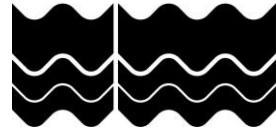
Staff member competing Equality Impact Analysis: **Paul Bolton**

Head of Service: Mark Hendriks

Date: 6th February 2024

Equality lead: Kaveri Sharma

Date: 14th March 2024



Guidance end-notes

¹ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing

² **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

³ **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)'

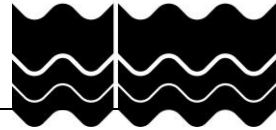
This section should explain what you are assessing:

- 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.

⁴ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write 'not applicable'.

⁵ **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?⁵
- 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?

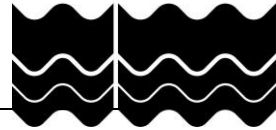
⁶ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act.

- 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.

⁷ 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?

⁸ 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.

⁹ **Age:** People of all ages

¹⁰ **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.

¹¹ **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

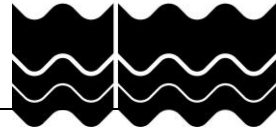
¹² **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹³ **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.

¹⁴ **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.

¹⁵ **Sex/Gender:** Both men and women are covered under the Act.

¹⁶ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people



¹⁷ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

¹⁸ **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.

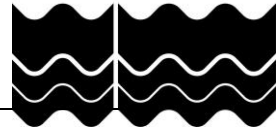
¹⁹ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?¹⁹
- 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?

²⁰ **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.

²¹ 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?

²² Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

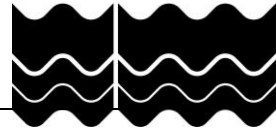
- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to address the negative impacts.
- 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.

²³ **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.

²⁴ **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.

²⁵ **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.



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- 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?

²⁶ **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.