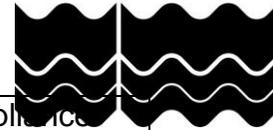# Equality Impact Analysis Template

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-users[1].
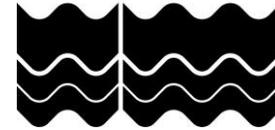
EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people[2]. EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010[3].

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/Policy[4]	Core Capital Programme
Team/Department[5]	IT & Digital
Directorate	BSD
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope[6]	The IT & Digital Core Capital Programme provides the basic technology capabilities that support the underpinning functioning of the organisation. This programme funds activity that is described as *Core Need.* This means providing technology that enables staff to connect, collaborate and work efficiently from wherever they need to be whilst operating highly available, secure and reliable services to support the continuous working of everything else. Within the programme, there are five essential programmes of foundation activity: 1. **Compliance** - supporting the Council in meeting its legal requirements & basic operational standards. This ensures the Council can continue to connect to central

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government & NHS services & maintain the technical controls to meet their compliance requirements. This includes certification for PSN, NHS Data Security & Protection Toolkit & Cyber Essentials Plus. These certifications underpin the council's partnership working programmes & the supportive, connecting technology they rely on.

2. **Cyber Defence** - Cyber-attacks are growing more frequent, more sophisticated & more damaging when they succeed. Whilst compliance provides the basics to stay safe and secure, the Cyber Defence Programme proactively enhances our organisation's resilience.

3. **IT Core Infrastructure** - With a basic need to store and manipulate data, these services provide the foundation to support the working of everything else. These are mission critical heartbeat services that are essential to ensure the council keeps working on a resilient and reliable basis.

4. **Staff Technology Refresh** - This programme provides staff with the technology tools that they need to do their work more efficiently. Refreshing equipment at regular intervals is vital to ensure that it stays up to date and safe to use.

5. **Enterprise Resource Planning** - This programme seeks to ensure that the pan enterprise systems that support core business processes and decision making remain reliable, resilient and readily available to keep all other services working.

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## Initial assessment of whether your project requires an EqIA

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?		No	
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?		No	
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 EqIA is necessary.
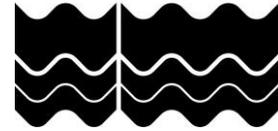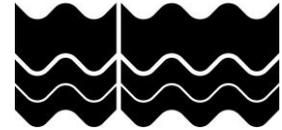
The need for an EqIA will depend on:

- 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
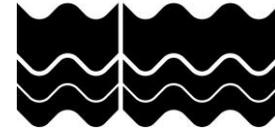
1. Update on previous EqIAs and outcomes of previous actions (if applicable)[7]
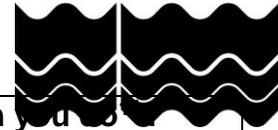
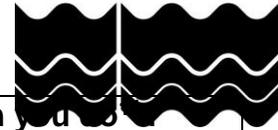| What actions did you plan last time? (List them from the previous EqIA)	What improved as a result? What outcomes have these actions achieved?	What further actions do you need to take? (add these to the Action Plan below)
Not applicable		

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 know[8]? Summary of data about your service-users and/or staff	What do people tell you[9]? Summary of service-user and/or staff feedback	What does this mean[10]? Impacts identified from data and feedback (actual and potential)	What can you do[11]? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age[12]	All staff & partners over employment age	Feedback collected during and at the end of each project within the programme	IT&D adopt a continual improvement approach throughout the service	Proactively act on Lessons Learnt reports to inform future projects
Disability[13]	Some users have specific technology needs	Information is input into projects via Senior User role or need is identified through the Service Hub	Specific hardware or software may be identified	Referral via IT&D Accessibility Officer ensures right solution is identified.
Gender reassignment[14]	Technology projects are gender neutral. Data held within business systems is the responsibility of the business system administrator / information asset owner.	IT projects within the core programme deal with the technical environment within which assets are hosted and are not concerned with the specific detail of business applications.	The Core Programme is not responsible for individual application administration.	Review each project at initiation
Pregnancy and maternity[15]	Devices that don't connect to the network for defined periods of time are dropped from	People on maternity leave need to be able to log in after extended periods of absence and it is vital that their user	A proactive process is in place to cover long periods of absence to ensure that staff entitled to do so, can connect to	Due to the security implications of access management, this is audited periodically.

| Protected characteristics groups under the Equality Act 2010	What do you know[8]? Summary of data about your service-users and/or staff	What do people tell you[9]? Summary of service-user and/or staff feedback	What does this mean[10]? Impacts identified from data and feedback (actual and potential)	What can you do All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	the network for security & license reasons.	experience of connecting to the network is uninterrupted.	the network whenever they need to.	
Race/ethnicity[16] Including migrants, refugees and asylum seekers	Core technology projects are user agnostic	N/A	N/A	Review periodically
Religion or belief[17]	Core technology projects are user agnostic	N/A	N/A	Review periodically
Sex/Gender[18]	Core technology projects are user agnostic	N/A	N/A	Review periodically
Sexual orientation[19]	Core technology projects are user agnostic	N/A	N/A	Review periodically

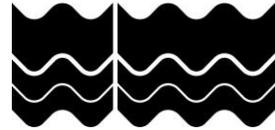| Protected characteristics groups under the Equality Act 2010	What do you know[8]? Summary of data about your service-users and/or staff	What do people tell you[9]? Summary of service-user and/or staff feedback	What does this mean[10]? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Marriage and civil partnership[20]	Core technology projects are user agnostic	N/A	N/A	Review periodically
Impacts on community cohesion[21]	Technology services enabled by this programme allow staff to connect securely, collaborate with partners and work efficiently from wherever they need to be to carry out their resident facing services.	Projects implemented through the Core Programme help teams stay connected and interact with service users.	Requirements gathering at the outset of a project, captures user requirements and informs outcomes sought	Standard project management methodologies and project governance provides oversight and review.
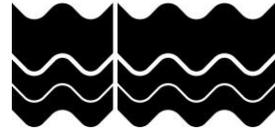
Additional categories
(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know[22]?	What do people tell you[23]?	What does this mean[24]?	What can you do[25]?
Rurality[26]	Core technology projects are geographically agnostic, services are designed to enable working from any location	Poor signal reception in some rural areas possible	Alternative solutions are offered to accommodate this	Identify affected spots and proactively offer alternative solutions
Carers	Technology services support hybrid working for maximum flexibility	Staff survey feedback confirms satisfaction with technology tools	Technology services support flexible ways of working	Continue to enable hybrid working
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note)[27]	Our core programme projects factor social value in at the procurement stage	People ask regularly how equipment can be reused and repurposed to serve disadvantaged groups	The scale of our work enables social value elements to be factored in at the procurement stage	Repurpose equipment as determined by the Digital Inclusion Board
Assessment of overall impacts and any further recommendations[28] - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)				
The IT & Digital Core Capital Programme provides the basic technology capabilities that support the underpinning functioning of the organisation. These services are essential to support the working of everything else. No significant impacts are expected. However, to minimise and prevent the unintended consequences of changes arising from the investment in technology, colleagues from HR&OD and the IT Accessibility function will be engaged during the process of development and implementation of the capital schemes within this portfolio of work.				
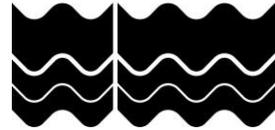
3. List detailed data and/or community feedback that informed your EqIA

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)
Review of Capital Forward Plan and Core Plan Projects	**14/10/21**	n/a	**Annual review at IT&D Capital Board to ensure updated in line with programme activity**

4. Prioritised Action Plan[29]

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
Annual review to ensure updated in line with programme activity	Review at IT&D Capital Board	Activity remains aligned with user base	Via benefits identified in each project	Annual activity
Age: ensure all projects meet user needs	Proactively act on Lessons Learnt reports to inform future projects	User satisfaction	User feedback	Specific to each project
Disability: Specific hardware or software may be identified	Referral via IT&D Accessibility Officer ensures right solution is identified.	Solutions will be designed with optimal accessibility in mind	Feedback on use	Specific to each project
Pregnancy / maternity: ensure that staff entitled to do so, can connect to the network whenever they need to	Due to the security implications of access management, this is audited periodically.	Uninterrupted access for authorised business users	Process working as designed and verified periodically via audit	Ongoing
(Add more rows as needed)				

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)

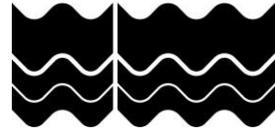**Staff member competing Equality Impact Analysis: Nicky Wilkins**   **Date: 3rd November 2021**

Directorate Management Team rep or Head of Service: Matt Scott   **Date: November 2021**

Equality lead: Sarah Tighe-Ford   **Date: 4th November 2021**

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).
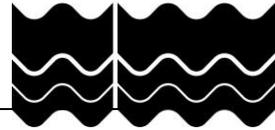
- **promote equality of opportunity**. This means the need to:
  - Remove or minimise disadvantages suffered by equality groups
  - Take steps to meet the needs of equality groups
  - Encourage equality groups to participate in public life or any other activity where participation is disproportionately 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?
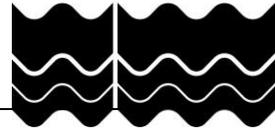
- Who is affected by the service, policy, strategy, practice, or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes, or improvements, are 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.
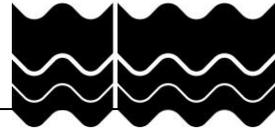
[7] **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write 'not applicable'.

[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:
  o Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
  o Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  o If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  o If there is negative differential impact, how can you minimise that while taking into account your overall aims
  o Do the effects amount to unlawful discrimination? If so, the plan must be modified.
  o 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.
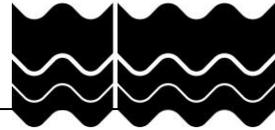
[14] **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does <u>not</u> need to be under medical supervision to be protected

[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.

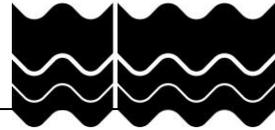[18] **Sex/Gender:** Both men and women are covered under the Act.

[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?
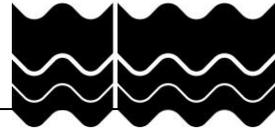
[23] **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act .
- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What 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:
    o Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
    o Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
    o If there are likely to be different impacts on different groups, is that consistent with the overall objective?
    o If there is negative differential impact, how can you minimise that while taking into account your overall aims
    o Do the effects amount to unlawful discrimination? If so the plan must be modified.
    o 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 <u>and</u> 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.

[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 <u>in favour of</u> implementing the policy must then be measured <u>against</u> 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.