

Equality Impact and Outcome Assessment (EIA)

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups². They help us make good decisions and evidence how we have reached these decisions³.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age¹³) or use the hyperlinks ('Ctrl' key and left click).

For further support or advice please contact:

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)**

1. Equality Impact and Outcomes Assessment (EIA)

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed⁴.

Title of EIA⁵	UK Shared Prosperity Fund Investment Plan	ID No.⁶	
Team/Department⁷	EEC – Culture, Tourism & Sport		
Focus of EIA⁸	<p>The UK Shared Prosperity Fund (UKSPF) is a central pillar of the government's ambitious Levelling Up agenda and a significant component of its support for building pride in places and increasing life chances. Places have been empowered to identify and build on their own strengths and needs at a local level to reduce inequality of opportunity and increase prosperity.</p> <p>Brighton & Hove has been allocated £1.766m from the UKSPF for investment by March 2025. An Investment Plan has been developed in consultation with local partners. The Plan focuses on delivery of interventions and outcomes under three key investment priorities - Communities & Place, Supporting Local Business, and People & Skills - as approved by the Department for Levelling Up, Housing and Communities (DLUHC).</p>		

The interventions planned are:

Communities and Place

- Funding for new, or improvements to existing, community and neighbourhood infrastructure projects
- Creation of and improvements to local green spaces
- Local arts, cultural, heritage & creative activities
- Community measures to reduce the cost of living

Supporting Local Business

- R&D grants supporting innovative product & service development
- Strengthening local entrepreneurial ecosystems
- Supporting decarbonisation & improving natural environment

People and Skills

- Employment support for economically inactive people
- Activities that address barriers to accessing training for those in employment who are not supported by mainstream provision
- Increase levels of digital inclusion, essential digital skills
- Green skills courses

2. Update on previous EIA and outcomes of previous actions⁹

What actions did you plan last time? (List them from the previous EIA)	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)
N/A	N/A	N/A

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹⁴	<ul style="list-style-type: none"> • The city's population is ageing – between 2011 and 2021 there was an increase of 9.5% in people aged 65 years and over, an increase of 1.7% in people aged 15 to 64 years, and a decrease of 6.8% in children aged under 15 years • COVID-19 led to high rates of unemployment, particularly amongst young people – at the peak there was a 180% increase in unemployment for 18-24 year olds. • Unemployment across all age groups as at Sep 2022 	<ul style="list-style-type: none"> • Digital exclusion has impacted older residents having been unable to access necessary information and health appointments 	<ul style="list-style-type: none"> • Tackling digital exclusion provides the chance to improve access to education, learning, health, income benefits and employment 	<ul style="list-style-type: none"> • Invest in a programme of courses targeted at digitally excluded groups, focusing on essential digital skills, communicating the benefits of getting (safely) online, and in community support to provide users with the confidence and trust to stay online • Invest in intensive and wrap-around one-to-one support to move people closer towards mainstream provision and employment - supporting access to basic skills training, job-searching,

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	is approximately 2,000 higher than March 2020.			and sustaining employment. <ul style="list-style-type: none"> • Invest in activities that address barriers to accessing training for those in employment who are not supported by mainstream provision • Promote the support and opportunities through channels to specifically reach protected groups • Support access to green skills courses.
Disability¹⁵	<ul style="list-style-type: none"> • 51,000 (22%) of adults in the city have two or more long term health conditions • 19,000 (8%) of adults in the city have mental and physical disabilities • People with disabilities or long-term health conditions are more likely to need ongoing support with the cost of food and fuel. • The House of Commons Research Briefing on Disability paper of 2022 shows that the proportion of disabled people with no 	<ul style="list-style-type: none"> • COVID-19 highlighted and exacerbated existing inequalities for disabled people 		<ul style="list-style-type: none"> • Create and improve local green spaces that are accessible and inclusive • Invest in community and neighbourhood infrastructure projects and improvements in programming, inclusion, accessibility, upgrading facilities for all and increasing usage • Invest in intensive and wrap-around one-to-one support to move people closer towards mainstream provision and

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	<p>qualifications was nearly three times that of non-disabled people. In addition, 13.3% of disabled people had no qualifications – almost three times the proportion of non-disabled people (4.6%)</p> <ul style="list-style-type: none"> • The Labour Force Survey 2020 showed that 9 million people of working age reported a disability. This can be further analysed as: <ul style="list-style-type: none"> ○ an employment rate of 53.8 for disabled people, compared to 82 for non-disabled people ○ an unemployment rate of 6.6 for disabled people, compared to 3.2 for non-disabled people ○ an economic inactivity rate of 42.4 for disabled people, compared to 15.4 for non-disabled people. 			<p>employment - supporting access to basic skills training, job-searching, and sustaining employment.</p> <ul style="list-style-type: none"> • Invest in activities that address barriers to accessing training for those in employment who are not supported by mainstream provision • Support access to green skills courses • Promote the support and opportunities through channels to specifically reach protected groups
Gender reassignment¹⁶	<ul style="list-style-type: none"> • Between 1,500 and 2,500 trans adults live in the city and many more visit, study or work in the city 		<p><i>No specific impacts of the Investment Plan identified for this group.</i></p>	

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Pregnancy and maternity¹⁷	<ul style="list-style-type: none"> • 25% of households in the city have dependent children 		<i>No specific impacts of the Investment Plan identified for this group.</i>	
Race/ethnicity¹⁸ Including migrants, refugees and asylum seekers	<ul style="list-style-type: none"> • The proportion of people in the city from Black, Asian, mixed ethnic groups has increased from 9.4% in 2011 to 11.5% in 2021. The White British population has decreased from 80.5% to 73.9% • 24% of the city’s population was born outside of the UK, including 10% from EU countries. • The city attracted more than 4,100 international migrants in 2021. • BME communities are not only more likely to have underlying health conditions because of their disadvantaged backgrounds but are also more likely to have shorter life expectancy as a result of their socioeconomic status, particularly those in deprived areas. • BME people are 4 times as likely to have no outdoor 	<ul style="list-style-type: none"> • Digital exclusion has impacted people whose first language is not English, having been unable to access necessary information and health appointments. 	<ul style="list-style-type: none"> • Tackling digital exclusion provides the chance to improve access to education, learning, health, income benefits and employment • Suitable outdoor and indoor gathering space to bring communities together is important • Business support should be targeted at entrepreneurs from BME backgrounds 	<ul style="list-style-type: none"> • Invest in intensive and wrap-around one-to-one support to move people closer towards mainstream provision and employment - supporting access to basic skills training, job-searching, and sustaining employment. • Invest in activities that address barriers to accessing training for those in employment who are not supported by mainstream provision • Strengthen local entrepreneurial ecosystems through funded business support programmes • Deliver research & development grants to support innovative product & service development • Promote the support and opportunities through channels to specifically

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	space at home <ul style="list-style-type: none"> • Local data suggests that there is a huge disparity in unemployment rates and economic activity amongst Black and Racially Minoritised communities in relation to White British residents. At the time of the 2011 census, Black African residents had an unemployment rate of 18.7%¹ and Gypsy or Irish traveller communities had an unemployment rate of 15.3%² - these are over twice the city average of 7.3%³. And, although economic activity rates between white British and 'BME' residents are very similar, hovering at around 66 to 67%,⁴ there are great differences within Racially Minoritised groups in the city. • The council is aware of a 			reach protected groups <ul style="list-style-type: none"> • Create and improve local green spaces that are accessible and inclusive

¹ [Black and Minority Ethnic Communities in Brighton & Hove \(bhconnected.org.uk\)](http://bhconnected.org.uk)
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	2020 report by British Business Bank which highlighted that Black and Racially Minoritised entrepreneurs experience far worse outcomes in their business journey than their White counterparts: “Black business owners have median turnover of just £25,000, compared to £35,000 for White business owners... only half of Black entrepreneurs meet their non-financial aims, compared to nearly 70% of White entrepreneurs. Those from Asian and Other Ethnic Minority backgrounds have better outcomes than Black entrepreneurs. However, they have a substantially lower success rate for starting a business and see less success overall compared to White entrepreneurs.			
Religion or belief¹⁹	<ul style="list-style-type: none"> • 49% of the city’s population have a religion. 		<i>No specific impacts of the Investment Plan identified for this group.</i>	

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<p>Sex/Gender²⁰</p>	<ul style="list-style-type: none"> • There is a relatively even split in males (49%) and females (51%) in the city • More than 3,000 women and almost 5,000 men in the city are unemployed (as at Sep 2022) • Female entrepreneurs from BME backgrounds experience the greatest disparities • Female business owners of all ethnicities experience significantly lower median turnover than male entrepreneurs and fewer say they meet their financial aims • Societal inequalities and established gender roles, such as having primary caring duties for children and elderly relatives, contribute to these disparities. However, even when these are accounted for, female entrepreneurs still experience less success 		<ul style="list-style-type: none"> • Businesses need the right support to scale their operations, and that the right kind of commercial space for them to flourish. • The city has a reputation for innovation, but businesses need continual investment to encourage creativity in product and service design alongside support to grow. • Business support should be targeted at female entrepreneurs 	<ul style="list-style-type: none"> • Strengthen local entrepreneurial ecosystems through funded business support programmes • Deliver research & development grants to support innovative product & service development • Promote the support and opportunities through channels to specifically reach protected groups

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Sexual orientation²¹	<ul style="list-style-type: none"> • 11-15% of the city’s population is estimated to be lesbian, gay or bisexual. • The city is known for being a welcoming place for LGBTQ+ people and hosts large-scale annual events such as Pride • The 2021 Census is predicted to show a significant increase in the city’s LGBTQ+ residents. • The Covid-19 lockdown restrictions closed many public spaces, including LGBTQ+ pubs, clubs, cafes, shops (some permanently because of the financial impacts) and cancelled major annual events, providing no opportunity for members of the community to come together 		<ul style="list-style-type: none"> • Safe and accessible places for communities to gather are needed 	<ul style="list-style-type: none"> • Invest in community and neighbourhood infrastructure projects and improvements in programming, inclusion, accessibility, upgrading facilities for all and increasing usage. • Invest in local arts, cultural, heritage & creative activities to improve venues, and increase the number and variety of inclusive events.
Marriage and civil partnership²²				

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Community Cohesion²³	<ul style="list-style-type: none"> • COVID-19 lockdown and social restrictions had disproportionate financial and economic impacts, both short-term and long-term community groups reliant on income from community venues and events • The city has a relatively large proportion of older people living alone and a higher percentage of older people who are income deprived. • LGTQ+ residents very isolated during covid due to the closure of safe spaces 	<ul style="list-style-type: none"> • As well as bringing some communities together in response to the pandemic, residents and communities have also been left isolated and disconnected from city life. 	<ul style="list-style-type: none"> • Suitable indoor and outdoor space is an essential component of a successful cultural sector, the availability of venues for all forms of audience engagement is an essential part of the city's recovery. • Joining up the city's creative spaces for professional artists, maximising their use and identifying ways to protect key venues that are under pressure. 	<ul style="list-style-type: none"> • Provide support for local arts, cultural, heritage and creative activities. • Provide funding for new, or improvements to existing, community and neighbourhood infrastructure projects • Invest in accessible and inclusive spaces and opportunities for people to come together, especially those with no outdoor amenity space at home. • Create and improve local green spaces that are accessible and inclusive • Invest in community resilience outcomes and capacity building for civil society to help strengthen community bonds across residents and communities of diverse backgrounds.
Other relevant groups²⁴	<ul style="list-style-type: none"> • Poverty in the city is considerably worse than before the pandemic with evidence of fuel poverty rising and the number of pupils receiving free school 	<ul style="list-style-type: none"> • Those in poverty are often digitally disadvantaged and struggle to access necessary information and health 	<ul style="list-style-type: none"> • Digital exclusion acts as a barrier to work and to skills development, impacting the ability of the unemployed and economically inactive to 	<ul style="list-style-type: none"> • Invest in community measures to reduce the cost of living by encouraging the uptake of energy efficiency measures

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	<p>meals rising.</p> <ul style="list-style-type: none"> • One in five of the 6,000 people needing emergency food in Brighton & Hove are children. • 12% of households estimated in 2020 to be in fuel poverty • Before the Autumn energy price cap increase food insecurity had risen to the highest level ever – higher even than the first wave of COVID-19. • Rising costs and the recession are expected to have significant impacts on local employment opportunities and increasing the number of Universal Credit claimants. • The largest employment sector in Brighton & Hove is retail (14% of employees), Health and social care (13%), and Education (12%) are the next largest sectors • More than 10,800 people aged 16-64 are economically inactive 	<p>appointments.</p> <ul style="list-style-type: none"> • The rising cost of fuel, food and energy is predicted to continue for some time and is significantly impacting the quality of life of city residents and tipping many local households into poverty. 	<p>join and progress within the labour market.</p> <ul style="list-style-type: none"> • Ensuring sustainable access to support and pathways to employment for residents who face barriers and inequalities in the labour market is critical. • Empowering the city to end linear wasteful practices through facilitating a change to a circular mindset can help people manage rising costs of living. • The government’s Plan for Jobs and the net zero by 2050 target creates opportunities to upskill residents in support of climate action, such as the retrofitting of buildings and the creation of new open spaces to promote biodiversity and carbon capture 	<ul style="list-style-type: none"> • Deliver intensive and wrap-around one-to-one support to move people closer towards mainstream provision and employment - supporting access to basic skills training, job-searching, and sustaining employment. • Deliver a programme of courses including basic skills, life skills and career skills for people who are unable to access training through the adult education budget or wrap around support. • Support access to green skills courses. • Invest in business support programmes and grant funding focused on increasing productivity, decarbonisation and new technologies.

Groups to assess	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	(including full time students) – this is 4.6% of the city’s population. • 16% of people have no qualifications in Brighton and Hove			
Cumulative impact²⁵				

Assessment of overall impacts and any further recommendations²⁶

The Shared Prosperity Fund Investment Plan for Brighton & Hove aims to help address inequalities in our communities – particularly health inequalities, barriers to work and progression, and digital exclusion - through skills development and the creation of accessible, inclusive places.

The actions detailed in this EIA reflect the interventions, outcomes and outputs specified in the Investment Plan. These interventions require further design and assessment of likely impacts as part of the detailed planning for delivery, in order to target provision accordingly. Each project/activity will seek to take a nuanced, intersectional approach to understanding and responding to the multiple barriers some of our residents experience due to their protected characteristic.

This overarching EIA will continue to be reviewed as the Investment Plan is implemented. Equalities monitoring data will be collected as an integral part of implementation and evaluation of the Fund.

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	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)
Census	2011 and 2021 (data released before January 2023)	2021 census results not yet full released (as at Dec 2022)	
Brighton & Hove Joint Strategic Needs Assessment	2019	None identified	
Local Insight profile for Brighton and Hove area, OCSI	June 2020	None identified	
Equalities and Access Workstream Report: Community impacts of COVID-19 lockdown on women, BAME, faith, LGBTQ and disabled communities in Brighton & Hove	August 2020		
Healthwatch Brighton & Hove Annual Report	2020-21		
Brighton & Hove City Plan 2020-23	2020-23		

Brighton & Hove Circular Economy Routemap and Action Plan	2020-35		
Brighton & Hove City Employment and Skills Recovery Plan	2021-23		
Food Impacts from the Cost of Living Increase	April 2022		
Brighton & Hove Economic Strategy	2018		
Alone together: Entrepreneurship and diversity in the UK - British Business Bank	2020		
UK Disability statistics: prevalence and life experiences	2022		
Labour Force Survey Annual Report Summary 2020	2020		
Black and Minority Ethnic Communities in Brighton & Hove	2015		

5. Prioritised Action Plan²⁷

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
<p>N.B. These actions form the UKSPF Investment Plan for Brighton & Hove, as approved by the Department of Levelling Up, Housing and Communities (DLUHC) on 5 December 2023.</p> <p>The outcomes and measures of success are those specified in the Plan and will be reported to DLUHC as part of regular monitoring and evaluation. Additional outcome and equalities data will be collected as required for local monitoring of the Fund; this will be determined as detailed planning for delivery of the interventions occurs.</p>				
Age, Race/Ethnicity, Other relevant groups	Deliver a programme of courses focused on essential digital skills, communicating the benefits of getting (safely) online, and in community support to provide users with the confidence and trust to stay online	Outcomes specified in the Investment Plan relate to the number of people supported to access basic skills and gain a qualification	Number of people gaining a qualification Number of people completing courses	By March 2025
Disability, Community Cohesion	Invest in accessible and inclusive spaces and opportunities for people to come together, especially those with no outdoor amenity space at home.	Outcomes specified in the Investment Plan focus on upgrading facilities to deliver well-being activities and attract visitors to the city	Facilities/amenities usage	By March 2025
Community Cohesion	Invest in community resilience outcomes and capacity building for civil society to help strengthen community bonds across residents and communities of diverse backgrounds.	Outcomes specified in the Investment Plan focus on improved venues, increasing the number and variety of inclusive events, and attracting a large number of attendees	Perception of local events	By March 2025

Age, Race/Ethnicity, Disability, Other relevant groups	Deliver intensive and wrap-around one-to-one support to move people closer towards mainstream provision and employment - supporting access to basic skills training, job-searching, and sustaining employment.	Outcomes specified in the Investment Plan focus on supporting access to basic skills and helping people to engage in job-searching and then gain and sustain employment.	Employability Engagement in job-searching Number of people in employment Number of people accessing basic skills training	By March 2025
Age, Race/Ethnicity, Disability, Other relevant groups	Deliver a programme of courses including basic skills, life skills and career skills for people who are unable to access training through the adult education budget or wrap around support.	Outcomes specified in the Investment Plan focus on supporting people to engage in life skills and more people accessing courses	Structural barriers into employment and skills provision	By March 2025
Age, Other relevant groups	Support access to green skills courses	Outcomes specified in the Investment Plan relate to the number of people supported to gain a qualification	Number of people gaining a qualification	By March 2025
Other relevant groups	Deliver business support programmes and grant funding focused on increasing productivity, decarbonisation and new technologies.	Outcomes specified in the Investment Plan focus on the uptake of specialist advice and supporting the purchase of new technology	Productivity Introduction of new technologies	By March 2025
Disability, Community Cohesion	Create and improve local green spaces that are accessible	Outcomes specified in the Investment Plan related to creating and improving green and/or blue space	Footfall	By March 2025
Other relevant groups	Invest in community measures to reduce the cost of living	Outcomes specified in the Investment Plan focus on supporting	Uptake of energy efficiency measures	By March 2025

		energy efficiency improvements, combatting fuel poverty and climate change		
Sexual Orientation, Community Cohesion	Invest in local arts, cultural, heritage & creative activities to improve venues, and increase the number and variety of inclusive events	Outcomes specified in the Investment Plan focus on improved venues, increasing the number and variety of inclusive events, and attracting a large number of attendees	Perception of local events	By March 2025
Gender, Race/Ethnicity	Strengthen local entrepreneurial ecosystems through funded business support programmes	Outcomes specified in the Investment Plan focus the number of businesses with improved productivity	Number of businesses receiving non-financial support	By March 2025
Gender, Race/Ethnicity	Deliver research & development grants to support innovative product & service development	Outcomes specified in the Investment Plan focus on the number of businesses adopting new or improved products or services	Number of businesses receiving grants	By March 2025
Age, Race/Ethnicity, Other relevant groups	Promote support and opportunities through channels to specifically reach protected groups	Linked to outcomes specified in the Investment Plan	Higher proportion of beneficiaries from underrepresented / protected groups	By March 2025

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

Staff member completing Equality Impact Assessment: Katie Read

Date: 20/12/2022

Directorate Management Team rep or Head of Service/Commissioning: Mark Fisher

Date: 20/12/2022

CCG or BHCC Equality lead: Emma McDermott

Date: 28/12/2022

Guidance end-notes

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

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their 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 and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have 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 impact and potential impact of our activities on all people in relation to their '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 what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

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

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by people due to their protected characteristics
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
 - Encouraging people from protected groups to participate in public life or in other activities where their 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 EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

⁴ **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

Do you need to complete an EIA? Consider:

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

⁵ **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁶ **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

⁷ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁸ **Focus of EIA:** 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 Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service 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 policy, practice, service 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, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

⁹ **Previous actions:** If there is no previous EIA or this assessment if of a new service, then simply write 'not applicable'.

¹⁰ **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?¹⁰
- 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 groups identified above 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?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#>) and national ones where they are relevant.

¹¹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- 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.

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- Try to consult in ways that ensure all perspectives can be considered.
 - Identify any gaps in who has been consulted and identify ways to address this.

¹² Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must 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 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?

¹³ Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- 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 improve 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 EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

¹⁴ **Age:** People of all ages

¹⁵ **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.

¹⁶ **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

¹⁷ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁸ **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.

¹⁹ **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.

²⁰ **Sex/Gender:** Both men and women are covered under the Act.

²¹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²² **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²³ **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

²⁴ **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

²⁵ **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

²⁶ **Assessment of overall impacts and any further recommendations**

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

²⁷ **Action Planning:** The Equality Duty 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.

