

General Equality Impact Assessment (EIA) Form

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	BHCC Advertising and Sponsorship Policy
Directorate:	
Service:	People and Innovation
Team:	Communications and Marketing
Is this a new or existing activity?	New policy
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Katie Read, Business Improvement Manager
Accountable Manager:	Natalie Orringe, Head of Strategic Communications
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The policy establishes a council-wide framework for seeking, assessing, accepting, refusing, managing and withdrawing advertising, sponsorship and brand activation on council-owned or council-managed assets. It is intended to generate sustainable income and public benefit while protecting public health, children and vulnerable people, equality, the environment, the public realm and the Council's reputation. It prohibits discriminatory or offensive content and specified harmful categories, restricts other higher-risk categories, applies High Fat, Salt and Sugars (HFSS) controls, and introduces proportionate due diligence, approval and review arrangements.

What are the desired outcomes of the activity?

• Consistent, transparent and evidence-based decisions across council services. • Responsible commercial income for reinvestment in services aligned with Council Plan priorities. • Reduced exposure on council-controlled assets to harmful, exploitative, misleading, discriminatory or inappropriate advertising. • Stronger protection for children, vulnerable adults and communities experiencing health or socio-economic inequalities. • Inclusive, accessible and socially responsible advertising, sponsorship and brand activation. • Clear accountability, complaints handling, and monitoring.

Which key groups of people do you think are likely to be affected by the activity?

Residents, visitors, workers and students who see advertising on council-controlled assets; children and young people; disabled people; older people; Black and Racially Minoritised communities; faith communities; women; LGBTQ+ and TNBI residents; pregnant people and families; migrants, refugees and people with limited English or literacy; carers; care-experienced people; people experiencing poverty, debt, homelessness, addiction, gambling-related harm, domestic abuse or other vulnerability; local businesses, charities, community organisations, advertisers, sponsors, agencies, council staff and contractors.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Policy development has included cross-service engagement covering Communications and Marketing, Commercial, Public Health, Legal, Finance, Procurement, Planning, Transport/Highways and operational services. Feedback has strengthened prohibited and restricted categories, HFSS controls, public-health safeguards, climate considerations, governance and escalation.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.
Disability and inclusive adjustments, coverage under equality act and not	NO – as above.
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO – as above.
Religion, Belief, Spirituality, Faith, or Atheism	NO – as above.
Sex	NO – as above.
Gender (including non-binary and Intersex people)	NO – as above.
Gender Reassignment	NO – as above.
Sexual Orientation	NO – as above.
Marriage and Civil Partnership	NOT APPLICABLE for routine monitoring; review if a proposal or complaint identifies a specific impact.
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.

Armed Forces Personnel, their families, and Veterans	NOT APPLICABLE for routine monitoring; review if a proposal or complaint identifies a specific impact.
Expatriates, Migrants, Asylum Seekers, and Refugees	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.
Carers	NO – as above.
Looked after children, Care Leavers, Care and fostering experienced people	NO – as above.
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO – as above.
Socio-economic Disadvantage	NO – as above.
Homelessness and associated risk and vulnerability	NO – as above.
Human Rights	NO – as above.
Another relevant group (please specify here and add additional rows as needed)	NO – as above.

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

A proportionate monitoring framework will be implemented rather than attempting to collect personal data from everyone exposed to public advertising.
Records of asset/location, audience context, product category, approval conditions, equality/public-health considerations, complaints and outcomes will be maintained.
Equality questions will be included in consultation and complaints pathways where appropriate.
Existing JSNA, Census, Health Counts, service data and community insight will be used to inform the assessment of advertising, sponsorship and brand activation placement.
Targeted engagement will be undertaken where a proposal could affect a particular group.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The Head of Strategic Communications will oversee implementation. A central decision and complaints log will be reviewed at least quarterly during the first year and then at an interval agreed through the

annual policy review. Monitoring will cover prohibited/restricted proposals, conditions imposed, location and audience, complaints by theme, upheld concerns, withdrawals, accessibility issues, HFSS compliance and evidence of public benefit will be included in the monitoring. Significant or recurring equality concerns will trigger corrective action. The EIA will be formally reviewed alongside the policy annually, or sooner following legal, public-health or strategic change.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations

- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Children and young people should benefit most from restrictions on gambling, harmful addictive substances, exploitative finance, inappropriate content and HFSS advertising, and from the policy requirement to protect children and vulnerable groups. Brighton & Hove has a comparatively young adult profile: the 2025 JSNA estimates 27% of residents are aged 19–33, compared with 17% in the South East and 19% in England. The policy therefore has particular relevance to young adults as well as children.

Negative: Older people and young people may experience repeated exposure differently; digital or experiential activations may exclude people with lower digital confidence or age-related access needs. Age-gating and placement controls could be inconsistently applied.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Prohibiting discriminatory content and requiring inclusion and accessibility reduces the risk of harmful representation. Restrictions on exploitative finance, gambling and harmful products may particularly benefit disabled people who also experience poverty, poor health or vulnerability.

Negative: Digital screens, moving/flashing content and light splay, audio, street clutter, poorly positioned activation equipment, inaccessible information and sensory overload could create barriers for people with visual, hearing, mobility, cognitive, learning or neurodivergent access needs.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Applying accessible creative and activation standards through the policy and agreed contract terms, e.g. step-free and obstruction-free layouts; accessible viewing/participation; adequate contrast and readable type; captions/transcripts where audio/video is used; alt text for digital content; plain English; non-digital alternatives; avoidance or careful control of flashing, rapid movement, and excessive brightness and sound. Specialist review where a proposal presents material sensory, mobility or communication risks.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?

YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The policy bars discriminatory or offensive content and requires advertising to uphold equality, diversity and inclusion. This can reduce racist stereotyping, hate speech and exclusion and can support responsible campaigns reflecting the city's communities.

Negative: Creative content may reproduce racial stereotypes, cultural appropriation or tokenism. Automated audience targeting or placement choices may exclude communities. English-only activations can disadvantage some residents, including Gypsy, Roma and Traveller people, migrants and refugees.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?

YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Prohibiting discrimination and offensive content supports freedom of religion or belief and protects residents from derogatory portrayals.

Negative: Advertising may stereotype faith groups, use sacred imagery inappropriately, promote hostility, or conflict with religious observance through timing, location or content. Conversely, over-cautious decisions could unnecessarily restrict lawful expression.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to [Sex](#)?

YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Restrictions on discriminatory, offensive, exploitative and harmful material can reduce sexist stereotyping and objectification. Controls on exploitative finance, gambling and alcohol may benefit women experiencing poverty, abuse or caring pressures.

Negative: Content may sexualise or objectify women, reinforce gender stereotypes, normalise violence, or use body-image and cosmetic claims that adversely affect women and girls.

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The policy's non-discrimination requirement and exception for equality-related communications can support inclusive representation of women, men, non-binary and intersex people, and prevent transphobic content.

Negative: Adverts with binary-only language, stereotyped roles, exclusionary facilities at activations or hostile public reaction may create disadvantage.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The policy reduces risk of homophobic or biphobic content and allows equality-related campaigns. Inclusive campaigns can improve visibility and belonging in Brighton & Hove, where we have a significant LGBTQ+ population.

Negative: Stereotyping, tokenism, exclusion or hostile responses may cause harm. Increased commercial use of established major events such as Pride may create reputational or community concern.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No specific disproportionate impact has been identified at policy level. The non-discrimination requirement applies. Sponsorship or campaign proposals connected to relationship or family services should will assessed case by case basis.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Responsible content standards can support respectful representation of pregnancy, parenthood, adoption, infertility and menopause and prevent discriminatory messaging.
Negative: Advertising may reinforce stereotype, make misleading health claims, or exclude pregnant people and parents from physical activations. Alcohol placement is also relevant where audiences may include pregnant people.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No specific disproportionate impact has been identified for Armed Forces personnel, families or veterans at policy level. General safeguards on exploitation, mental health, addiction, gambling and financial harm remain relevant. Individual campaigns and locations will be reviewed where evidence indicates a particular veteran impact.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Controls on exploitative finance, misinformation, offensive content and discrimination can protect people new to the UK and those facing language or immigration-related vulnerability.

Negative: English-only information, culturally specific messages, stereotypes or unclear sponsorship/endorsement may disadvantage migrants, refugees and asylum seekers.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Restricting harmful and exploitative products may benefit carers and the people they support, especially where disability, age or low income intersect.

Negative: Activations at fixed times or inaccessible venues and complex information may exclude unpaid carers.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Children in care and care leavers may benefit from stronger safeguards against gambling, exploitative finance, harmful substances and HFSS product content. The policy can support the Council's corporate-parenting responsibility by applying heightened care to young audiences.

Negative: Stigmatising portrayals, data capture during activations, or offers that encourage debt or risky consumption could cause harm.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk

YES

and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: Prohibitions on exploitative financial products, gambling and harmful substances address products capable of aggravating financial, addiction and health harms experienced by people who are homeless or at risk of homelessness.

Negative: Potential hostile or stigmatising imagery and exclusion from public space during activations.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The prohibition of offensive, violent and socially harmful content and controls on exploitative sectors can reduce exposure to triggering or coercive messages.

Negative: Potential for imagery or experiential activity to have themes of violence, control, sexualisation, alcohol or financial dependency which may retraumatise survivors or compromise privacy/safety.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The strongest anticipated benefit is for residents experiencing poverty or financial insecurity. The policy prohibits payday loans/exploitative finance and gambling, restricts alcohol and HFSS advertising, and requires public benefit.

Negative: Advertising may be concentrated in high-footfall or deprived areas; some sponsorship could commercialise essential services or create perceived endorsement. Small/local organisations could face access barriers if opportunities are packaged only for large brands.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive: The policy supports dignity, non-discrimination, protection from harmful messaging, lawful expression and transparent decision-making.

Negative: Refusal of advertising may limit freedom of expression, while acceptance can affect privacy, family life, freedom of thought/religion and non-discrimination. Brand activations may also capture images or personal data.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

The policy is likely to produce cumulative positive impacts for people who experience several overlapping inequalities, for example a disabled young person living in a deprived area, an older migrant with limited English, an LGBTQ+ care leaver, or a woman experiencing domestic abuse and debt. These groups may otherwise face greater exposure or susceptibility to exploitative finance, gambling, alcohol, HFSS, discriminatory or misleading content.

Cumulative risks arise if higher-risk advertising is geographically concentrated; if decisions consider one characteristic at a time; if public spaces become cluttered or physically inaccessible; if digital-only interaction excludes people; or if commercial income is prioritised over dignity, safeguarding and public benefit.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. Ensure equality and accessibility are key elements of an assessment checklist for approval decisions on advertising, sponsorship and brand activations. The assessment will explicitly consider equality, accessibility, placement and likely audience, including any potential disproportionate or cumulative impacts.

Owner: Head of Strategic Communications, supported by EDI, Public Health and Legal.

2. Establish a central advertising and sponsorship decision, placement and complaints log. Recording category, location, audience, restrictions/conditions, equality issues, complaints and outcome.

Owner: Marketing & Communications.

3. Introduce accessible creative and brand-activation requirements in guidance and contract terms.

Owner: Marketing & Communications with Procurement/Legal.

4. Monitor geographic and cumulative exposure to restricted categories, mapping placements against schools/youth settings and deprivation where data is available.

Owner: Marketing & Communications with Public Health.

Actions 1 to 3 will be incorporated into implementation arrangements before relevant advertising and sponsorship activity commences. Geographic and cumulative exposure under Action 4 will be monitored during the first year and considered through the annual policy and EIA review. The approval framework should therefore consider place, audience, product, creative treatment, frequency, cumulative exposure and intersections together, rather than assessing the advert in isolation.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Actions will be transferred to the Advertising and Sponsorship Policy implementation plan and relevant contract/procurement mobilisation plans. Progress will be considered through quarterly implementation monitoring and the annual policy/EIA review.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.

Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Not applicable.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The assessment identifies overall positive equality and public-health impacts from a consistent council-wide policy that prohibits discriminatory and harmful content, restricts higher-risk categories, controls HFSS advertising and protects children and vulnerable people. Potential adverse impacts relate mainly to unequal geographic exposure, inaccessible formats or activations, stereotyping in advertising content, digital exclusion, privacy and inconsistent decision-making. These impacts are capable of mitigation through an equality/accessibility checklist, accessible standards, transparent reasoned decisions, placement monitoring, complaints analysis and annual review.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

The EIA should be published alongside the final policy and Cabinet report once approved by the EDI Team. No reason for non-publication has been identified. Personal data from consultation or complaints must be anonymised and not included.

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Katie Read, Business Improvement Manager	18 September 2026
Accountable Manager:	Natalie Orringe, Head of Strategic Communications	29 September 2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Officer to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Eric Page	29 September 2026
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Comments added for reflection and consideration /remove when updated
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Notes and recommendations (if any) from EDI Manager reviewing this assessment:

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