

Appendix 3

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's [Public Sector Equality Duty \(PSED\) \(Equality Act 2010\)](#).

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **foster good relations.**
2. [An EqIA must be done before making any decision\(s\)](#) that may have an impact on people and/or services that people use and depend on.
 3. [An EqIA form is one of many tools](#) that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that [Corporate Management Team \(CMT\) reports and all projects must attach an EqIA](#).

For questions, queries, and a chat about how to do your EqIA, please email your EDI officers:

1. Mili Kalia – milkalia@oxford.gov.uk
2. Sobia Afridi- safриди@oxford.gov.uk

Please do refer to our [SharePoint Page](#) for support such as FAQs and Examples, etc.

A good EqIA has the following attributes:

1. **Comprehensively considers the [9 protected characteristics](#).**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed. For example: -New policy, -Review of existing policy, -Changes in service(s), -New project(s), etc.	Proposal to voluntary adoption of the socio-economic duty in the Council's policy framework and decision making.	2.	The implementation date of the activity under consideration:	01/09/2024
3.	Directorate/Department(s):	Corporate Strategy	4.	Service Area(s):	Policy and Partnerships
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	Lucy Cherry lcherry@oxford.gov.uk Clayton Lavallin clavallin@oxford.gov.uk Mili Kalia mkalia@oxford.gov.uk	6.	Contact details, in case there are queries: Please provide: -Name -Email address	Lucy Cherry lcherry@oxford.gov.uk Clayton Lavallin clavallin@oxford.gov.uk Mili Kalia mkalia@oxford.gov.uk
7.	Is this a new or ongoing EqlA?	New <input checked="" type="checkbox"/> Extension to existing EqlA <input type="checkbox"/>	8.	If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA.	Not relevant
9.	Date this EqlA started:	01/02/2024			
10.	Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	Unsure	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	<input type="text"/>

Section 2: About the activity, change, or policy that is being assessed.

<p>12.</p>	<p>Type of activity being considered:</p> <p>Check the most appropriate.</p>	<input type="checkbox"/> Budget	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input checked="" type="checkbox"/> Change to an existing activity.
		<input checked="" type="checkbox"/> New Activity	<input type="checkbox"/> Others. Please		
<p>13.</p>	<p>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2020-2024)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input checked="" type="checkbox"/> Enable an inclusive economy.	<input checked="" type="checkbox"/> Deliver more affordable housing.	<input checked="" type="checkbox"/> Support thriving communities.	<input checked="" type="checkbox"/> Pursue a zero carbon Oxford.
<p>14.</p>	<p>Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input checked="" type="checkbox"/> Responsive services and customer care.	<input checked="" type="checkbox"/> Diverse and engaged workforce.	<input checked="" type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.
<p>15.</p>	<p>Outline the aims, objectives, & priorities of the activity being considered.</p>	<p>Aims: Voluntary adoption of the socio-economic duty in the Council's policy framework and decision making.</p>		<p>Objectives: The development of a holistic approach to addressing the inequalities of outcome that stem from socio-economic disadvantage.</p>	<p>Priorities: A detailed implementation and action plan would need to be developed.</p> <p>Thorough review and consultation will be required prior to changing any existing provisions that will have an</p>

			<p>impact of socio-economic status. These changes may be related to leisure concessions, Council Tax reductions, single-person discount schemes, grant funding, to name a few. The burden of duty will be higher if these changes will impact other protected characteristics.</p>
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<p>16. Please outline the consequences of not implementing this activity. For example,</p> <ul style="list-style-type: none"> -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few. 	<p>There is currently no consequences of not implementing this activity.</p>		
	<p>The Council is currently not legally required to adopt the activity, as the activity is not enacted as law in England.</p>		

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Section 3: Understanding service users, residents, staff and any other impacted parties.

<p>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details—</p> <ul style="list-style-type: none"> -when, -how many, and -the approach taken. 	<p>A succinct internal Horizon Scanning exercise across the Council identified a number of initiatives, programmes and action plans may already be delivering a commitment towards SED.</p>		
	<p>A more extensive external Horizon Scanning exercise was taken liaising with officers at a number of other English local authorities that have voluntarily adopted the SED to understand how they had implemented this into their policy-making process and their approach to managing the risks of legal challenge.</p>		
	<p>Officers also met with colleagues from Edinburgh City Council where SED is adopted statutorily under Scottish law.</p>		

	<p>Briefings were taken to both the Corporate Management Team (December 2024) and Leaders all Cabinet meeting (January 2024).</p> <p>Legal colleagues were asked to contact one or more of the small number of councils that have adopted to see if they sought any legal opinion on this - and would they share, or at least give us a sense of it. No response was received to the enquiries made seeking an insight into the consideration, if any, of any legal implications elsewhere.</p> <p>However, the feedback from those councils that did respond more generally was:</p> <ol style="list-style-type: none"> None had experienced legal challenges Some had taken a relatively low-key or non-formal approach to SED adoption Most utilised existing EqIA processes together with clearly defined datasets as tools to implement the SED. <p>Officers also met with colleagues from Edinburgh City Council where SED is adopted statutorily under Scottish law.</p> <p>Briefings were taken to both the Corporate Management Team (December 2024) and Leaders all Cabinet meeting (January 2024)</p>
<p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be-</p> <ul style="list-style-type: none"> -third-party research, -census data, -legislation, -articles, -reports, -briefs. 	<p>Horizon Scanning and Insight.</p> <ul style="list-style-type: none"> - Third-party research - Legislation - Articles - Reports - Briefing papers to the Corporate Management Team and Leaders all Cabinet meetings - Presentations and discussions and internal steering groups - Interviews <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 1 - Horizon Scanning and insight.</p>
<p>19. If you have not done any consultations or collected data & information, are you planning to do so in the future?</p>	<p>Not applicable</p>

Please list the details –
 -when,
 -with whom, and
 -how long will you collect the
 relevant data.

Section 4: Impact analysis.



20. Who does the activity impact? Check as needed. The impact may be positive, negative or unknown.	Service Users	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	Members of staff	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	General public	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	Partner / Community Organisation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>
	City Councillors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	Council suppliers and contractors	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>

21.

Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?

Check as needed and provide evidence-driven conclusions.

Good Practice is to keep it simple and list your, evidence, insights, and mitigations.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age 309	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
Disability (Visible and invisible)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Evidence 	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>

<p>Gender re-assignment</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Marriage & Civil Partnership</p> <p>310</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <p>www.oxford.gov.uk</p>	<p>Evidence</p> 	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Race, Ethnicity and/or Citizenship</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p>

						<p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">311</p> <p>Pregnancy & Maternity</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p> 	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Religion or Belief</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p>

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						<p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Sex</p> <p>312</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>  <p>www.oxford.gov.uk</p>	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Sexual Orientation</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>  <p>www.oxford.gov.uk</p>	<p>There is the potential risk of judicial review if the Council is not taking all relevant factors into account nor making “reasonable” decisions. It is possible that decisions can be challenged if it can be argued/demonstrated that they have not been properly made.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>

<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Migrant, refugee, or asylum seekers</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p>	<p>What is the data telling us about impact on this group?</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Socio-economic status (income, wealth, etc.)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Evidence</p> 	<p>According to the 2019 Index of Multiple Deprivation</p> <ul style="list-style-type: none"> - 10 of Oxford's 83 neighbourhood areas ('Super Output Areas') are among the 20% most deprived areas in England. These areas, which are in the Leys, Rose Hill, Littlemore, Barton and areas of the city, experience multiple levels of deprivation – low skills, low incomes and relatively high levels of crime. - Men and women living in relatively deprived areas have a shorter life expectancy than those living in the least deprived areas. - After adjusting for housing costs, 26% of children in Oxford live below the poverty line. According to the Indices of Deprivation 2019 rates of child poverty have reduced in the most deprived

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neighbourhoods but there remain six Oxford neighbourhoods with child poverty rates over 30%
 - In March 2023 Oxford had 2,710 (2.3%) working-age residents claiming unemployment benefits (Jobseeker's Allowances or Universal Credit claimants who are out of work), 60% men and 40% women. The rate for March 2023 is now lower than the rate for the same period last year (2.6%) and is still below the national and regional rates of 2.9% and 3.8% respectively.

- There is a significant proportion of Oxford's adult population - 19% - who have no or low qualifications.

Inequalities in life expectancy at birth for men from the least to the most deprived areas of Oxford are estimated to be around 13 years. For women, there is a smaller gap of around 9 years.

In Year 6, 25.1% (345) of children are classified as obese, worse than the average for England at 23.4%.

The rate for alcohol-specific hospital admissions among those under 18 is 30 per 100,000, worse than the average for England.

Oxford remains the least affordable UK cities for housing with average house prices over 15 times the average salary in 2022.

						<p>Rented housing in Oxford is also relatively expensive – monthly rents in the city are some of the highest in the South East.</p> <p>Please refer to the Council's Cabinet report (13 March 2024) for this activity and Appendix 2 - Risk Register</p>
<p>Other For example: - Unpaid carers - Prison population - Homeless population - Council suppliers & contractors - Cabinet Members</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.	Conclusions. Check as needed.						
	<input type="checkbox"/>	Stop and reconsider the activity.	<input type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input type="checkbox"/>	No major change(s) or adjustments and continue with activity but continue to monitor.	<input checked="" type="checkbox"/>

23. Please explain how you have reached your conclusions above.

Having assessed the SED implementation approaches across several other local authorities, including in Scotland where it has statutory weight and in England where it is only voluntary, it is believed a relatively light touch approach can be taken, requiring minimal additional resource.

This is because Oxford City Council's strategic approach to policy already has significant regard to promoting inclusion and tackling economic inequalities; and because the Equalities Impact Assessment (EqIA) process already in place for policymaking provides an appropriate mechanism for SED implementation.

Further work will need to be done to confirm the appropriate data measures used to assess socio-economic need and associated policy impacts. An enhanced EqIA will need to be designed together with associated guidance, and training will need to be provided for officers and members in the application of the new approach. Therefore, full implementation of the SED would need to follow within the 24/25 Council year.

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	<p>Who or which team or service area will be responsible for monitoring equalities impact?</p> <p>For example- - team, -directorate, -service area, -Equalities Steering Group,etc.</p>	<p>Equalities Steering Group</p> 	
25.	<p>Who (individual, team, or service area) will be responsible for carrying out the EqIA review?</p>	<p>Corproate EDI Lead Policy and Partnerships Officer Economic Development Team Leader</p> 	
26.	<p>How often will the equality impact be reviewed for this activity?</p> <p>For example- -quarterly, -yearly, etc.</p>	<p>Yearly</p>	<p>27. Date when the EqIA will be reviewed again.</p> <p>31/01/2025</p>

Section 7: Sign-off

Name: Mili Kalia

Job Title: Corporate EDI Lead

Signature:

Name: Sally Hicks

Job Title:

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Lucy Cherry

Job Title: Policy & Partnerships Officer

Signature:

Name: Mish Tullar

Job Title: Head of Corporate Strategy

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Clayton Lavallin

Job Title:
Economic Development
Team Leader

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqlA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
 1. Other project leads
 2. Other service area and/or team lead/managers.

This is not an exhaustive list.

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You have now reached the end of the assessment.

⚠ Please append this to any reports and project files for reference.