

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.**

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 | NEW- Socio-economic inequalities (voluntary adoption) |

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

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|-----|---|---|-----|---|--|
| 1. | Name of activity being assessed. New Positive Action Policy | Appropriation of land at Underhill circus | 2. | The implementation date of the activity under consideration: | September 2025 |
| 3. | Directorate/Department(s): | Place | 4. | Service Area(s): | Economy, Regeneration and Sustainability |
| 5. | Who is (are) the assessment lead(s): Please provide: -Name -Email address | Safridi@oxford.gov.uk | 6. | Contact details, in case there are queries: Please provide: -Name -Email address | Error! Bookmark not defined. |
| 7. | Is this a new or ongoing EqlA? | New <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. | |
| 9. | Date this EqlA started: | 17/06/2025 | | | |
| 10. | Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online? | Will be attached to the cabinet report can be published if required | 11. | Give a date (tentative or otherwise) when this assessment will be taken to the CMT. | |

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

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|-----|---|---|--|---|--|
| 12. | Type of activity being considered: Check the most appropriate. | Change to an existing activity. | | | <input type="checkbox"/> |
| | | <input checked="" type="checkbox"/> New Activity | <input type="checkbox"/> Others. Please specify: | | |
| 13. | Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil? Please check as needed. | <input type="checkbox"/> Good, affordable homes x | <input type="checkbox"/> Strong, fair economy N/A | <input type="checkbox"/> Thriving Communities N/A | <input type="checkbox"/> Zero Carbon Oxford N/A <input type="checkbox"/> Well run council Yes |
| 14. | Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil? Please check as needed. | <input type="checkbox"/> Responsive services and customer care. N/A | <input type="checkbox"/> Diverse and engaged workforce. Yes | <input type="checkbox"/> Leadership & organisational commitment. N/A | <input type="checkbox"/> Understanding and working with our communities. x |
| 15. | Outline the aims, objectives, & priorities of the activity being considered. | The aim of this activity is to ensure that the decision to appropriate land for planning purposes — specifically for the delivery of affordable housing — is made in a way that is fair, transparent, and compliant with the Public Sector Equality Duty (PSED). It seeks to identify and mitigate any potential negative impacts on people with protected characteristics under the Equality Act 2010. | | | |
| 16. | Please outline the consequences of not implementing this activity. For example, -Existing activity does not fulfill | Inequality: Existing barriers and biases may persist, resulting in unequal opportunities and treatment for certain groups. Low Morale: Members of the community may feel undervalued and disengaged, leading to lower morale and productivity. | | | |

Corporate Objectives,
-existing activity is discriminatory
and not fulfilling Council's PSED,
... to name a few.

The consequences of not implementing this activity would be non-compliance with statutory duties, risk of discriminatory outcomes and weakened decision-making.

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

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|--|--|
| <p>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details— -when, -how many, and -the approach taken.</p> | <p>Consultation published on the Oxford Council website and advertised in the local newspaper. A notice announcing the Council's intention to appropriate the land to a 'Planning Purpose' at Underhill Circus was published in the Oxford Times for two consecutive weeks from 10 July 2025 to 24 July 2025 (see Appendix 1). A plan showing the location of the area proposed to be appropriated was available for inspection during work hours at the Oxford City Council offices (the Town Hall) during this time.</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— -third-party research, -census data, -legislation, -articles, -reports, -briefs.</p> | <p>We have reviewed data to include: The community data profile for Barton (Census data from Barton and Sandhills ward v2, updated October 2024)</p> <p>It shows that, compared with Oxfordshire as a whole, Barton and Sandhills ward had an above average proportion of:</p> <ul style="list-style-type: none"> • Young residents (0 to 15 years old) and working age residents (30 to 40 years old); • People from an Asian ethnic background (16% vs 6%) and a Black background (8% vs 2%); • People living in social rented households (35% vs 15%) and privately rented households (25% vs 20%); • People economically active in employment (65% vs 61%); • People in Routine (17% vs 10%) and Semi-routine occupations (13% vs 10%). <p>According to the ONS Census 2021, the total population of Barton MSOA was 8,396 up from 7,013 in Census 2011, an increase of 1,400 (+20%).</p> |
| <p>19. If you have not done any consultations or collected data & information, are you</p> | <p>N/A</p> |

planning to do so in the future?

Please list the details –

-when,
-with whom, and
-how long will you collect the relevant data.

Section 4: Impact analysis.

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

This is a positive development that will provide much needed affordable housing to residents of Oxford City.

Whilst this change is likely to affect those who are currently using the green space to the north of Underhill Circus, the goal is to find a balance between the need for affordable housing development and the preservation or replacement of residents' access to open space. The mitigating actions and the alternative green spaces and parks available near-by suggest that the appropriation will not have a disproportionately negative impact on the protected characteristics. It is vital that the impact is monitored through effective communication with the community throughout and after the development and that another EQIA is completed to better understand if the mitigations put forward have been sufficient in respect of the rights and well-being of the community.

The closure of the site during development will create a short-term loss of access to facilities and pedestrian pathway. This, however, represents the best option to secure the safety of the public during the development.

The Council will continue to engage with residents and respond to comments and concerns raised.


| Protected Characteristic | Positive | Negative | Neutral | Don't know | Data/information/evidence supporting your assessment | Analysis & insight Mitigations |
|--------------------------|----------|--------------------------|-------------------------------------|--------------------------|--|--|
| Age | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Workforce report shows the average employee age is 45, the same as last year and in line with the local population where, at 34% of the total population, the 35-49 age band of Oxford residents is the largest. The largest | Continue to monitor workforce profile. |

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| | | | | | employee group is the 51-60 age band. | |
| Disability (Visible and invisible) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 10.2% of the workforce declared a disability, a small decrease from last year at 10.4%. This compares well to the local population of 9.2%. Employees with a disability are well represented at lower grades and at senior grades representation has increased from 2% to 5% in 2024. Positive action will help to tackle under-representation at senior levels. | Continue to monitor workforce profile. |
| Gender re-assignment | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | When we look at employee numbers, they are very small. This is not shown in the workforce report. It is not appropriate to report the data because of the small group size. | The Council's approach to inclusion will support all employee groups. |
| Marriage & Civil Partnership | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> | <u>We do not monitor this data.</u> | The Council's approach to inclusion will support all employee groups. |

| | | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--|--|
| <p>233</p> <p>Race, Ethnicity and/or Citizenship</p> | X | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>The Workforce Equality report shows that employees from minority ethnic groups is 14%. The proportion of people from minority ethnic groups applying for jobs has increased from 32% to 39.8%. The proportion appointed has increased to 18.5% from 14% last year. Ethnic minority representation in management roles has increased from 9% to 10% (21% managers have not declared their ethnicity). Census data puts the economically active population from ethnic minority groups at 27.7%.</p> <p>Employees from the majority ethnic group (white) may feel disadvantaged. It is possible that white employees or candidates for jobs may not have as many opportunities.</p> | <p>Positive action can help to tackle under-representation.</p> <p>We will establish clear, objective criteria for positive action and it will be evidence led.</p> <p>We will monitor the outcomes of any positive action</p> |
| <p>Pregnancy & Maternity</p> | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> | <p>We do not monitor this data.</p> | <p>The Council's approach to inclusion will support all employee groups.</p> |

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|---------------------------|---|---|--|--------------------------|--|---|
| | | | | | | |
| 234 Religion or Belief | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | <p>34% of the workforce has declared as Christian compared with 41% in Oxford. 29.1% is atheist/humanist/no belief compared to 40% in Oxford and 28.2% of employees have not provided information. 4.4% of the workforce has chosen other, 2.1% is Muslim (Oxford 7.2%) and 0.5% Sikh (Oxford 0.4%).</p> | |
| Sex | <input checked="" type="checkbox"/> Female | <input checked="" type="checkbox"/> Male | | <input type="checkbox"/> | <p>Over half of the workforce are women (60%) which is around 10% above that of the population of Oxford at</p> | <p>We will establish clear, objective criteria for positive action and it will be evidence led.</p> |

| | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--|--|
| | | | | <p>50.1%. However, women are not represented at the same level in senior roles at grade 11 and above.</p> <p>Positive action in favour of women may disadvantage men and male employees may feel this.</p> <p>Male employees may not have as many opportunities.</p> | <p>We will monitor the outcomes of any positive action.</p> |
| <p>Sexual Orientation</p> <p>235</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <p>Workforce report shows: 4.2% of the workforce identifies as bisexual, lesbian or gay. The 2021 census data indicates that 4.7% of economically active residents in Oxford identify as bisexual, lesbian and gay. We have started to collect data on non-binary and trans staff but it is likely that individuals may feel reluctant to share this data before they learn about the organisation's culture</p> | <p>The Council's approach to inclusion will support all employee groups.</p> |

| | | | | | | |
|---|--------------------------|--------------------------|---|--------------------------|--|---|
| Socio-economic inequalities such as: - income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024. | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> | The policy demonstrates a commitment to diversity and inclusion and may encourage other groups to apply for posts at the Council. Individuals will see it as a positive step to diversify our workforce. | The Council's approach to inclusion will support all employee groups. |
| Other (voluntary consideration) For example: Migrant, refugee, or asylum seekers. | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> |  | |
| Other For example: <ul style="list-style-type: none"> - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | |

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

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|-----|---|--------------------------|--|---|--|--|
| 22. | <p>Conclusions. Implementation of a positive action policy is crucial for fostering an inclusive, diverse, and equitable work environment. A positive action policy will help to address inequity, promote innovation, and improve the Council's reputation as an inclusive employer. By setting clear aims, objectives, and priorities, and addressing potential barriers, we can create a more supportive and dynamic environment that benefits everyone.</p> | | | | | |
| | <input type="checkbox"/> Stop and reconsider the activity. | <input type="checkbox"/> | <input checked="" type="checkbox"/> Adjust activity before beginning the activity and continue to monitor. | <input checked="" type="checkbox"/> No major change(s) or adjustments and continue with activity but continue to monitor. | <input type="checkbox"/> No major change(s) or adjustments and continue with the activity. No need to monitor in the future. | |
| 23. | <p>Please explain how you have reached your conclusions above.</p> <p>We have reached this conclusion by analysing the potential benefits of implementing a positive action policy and balancing these with the negative consequences of not having a policy. Here is a breakdown of the reasoning:</p> <p>Benefits of Implementation:</p> <p>Promotes Equity: Ensures everyone has equal opportunities.</p> <p>Enhances Diversity: Creates a more inclusive environment.</p> <p>Improves Representation: Helps underrepresented groups gain visibility and opportunities.</p> | | | | | |

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqlA action plan lies with the service/team completing the EqlA.

These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

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|-----|--|--|-------------------------------|---|--|
| 24. | <p>Who or which team or service area will be responsible for monitoring equalities impact?</p> <p>For example-</p> <ul style="list-style-type: none"> - team, -directorate, -service area, -Equalities Steering Group,etc. | | People Services, Sobia Afridi |  | |
| 25. | <p>Who (individual, team, or service area) will be responsible for carrying out the EqlA review?</p> | | Sobia Afridi | | |
| 26. | <p>How often will the equality impact be reviewed for this activity?</p> <p>For example-</p> <ul style="list-style-type: none"> -quarterly, -yearly, etc. | | Yearly | 27. | Date when the EqlA will be reviewed again. |
| | | | | | July 2026 |

Section 7: Sign-off

239

| | | |
|--|---------------------------|----------------------|
| Name: <input type="text"/> | Name: Sobia Afridi | Name: Full Name |
| Job Title: <input type="text"/> | Job Title: EDI Specialist | Job Title: Type here |
| Signature: ----- | Signature: ----- | Signature: ----- |
| Name: <input type="text" value="Gail Malkin"/> | Name: Full Name | Name: Full Name |
| Job Title: Head of People | Job Title: Type here | Job Title: Type here |
| Signature: G Malkin ----- | Signature: ----- | Signature: ----- |
| Name: Full Name | Name: Full Name | Name: Full Name |
| Job Title: Type here | Job Title: Type here | Job Title: Type here |
| Signature: ----- | Signature: ----- | 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.

You have now reached the end of the assessment.

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