

# South Cambridgeshire District Council Equality Impact Assessment (EqIA)

# Introduction – Please read

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that the Council are meeting its legal duty, demonstrating due regard for the provisions of the Public Sector Equality Duty as below:
  - o Eliminate unlawful discrimination, harassment, and victimisation
  - Advance equality of opportunity between those who share a protected characteristic and those who do not
  - Foster good relations between those who share a relevant protected characteristic and those who do not
- Methodically consider and assess the impacts of proposals across the <u>nine</u> <u>protected characteristics</u>
- Allow the Council to develop and implement high quality proposals that maximise positive outcomes for all.

EqIAs should be completed during the development and review of all Council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.

When the form is completed, please send an electronic copy to <u>equality.schemes@scambs.gov.uk</u>. Further support and guidance, <u>including a video</u> <u>on how to fill out EqIAs</u>, is available on Insite or you can contact the Policy and Performance Team.



# **Equality Impact Assessment Complete Form**

# **Section 1: Identifying Details**

- 1.1 Officer completing EqIA: Michael Hill
- 1.2 Team and Service: Chief Executive's Office
- 1.3 Title of proposal:
   Consultation on South Cambridgeshire District Council's (SCDC) Four-Day Week
- 1.4 EqIA start date: 09/08/2024
- 1.5 Proposal implementation date: 16/01/2025
- 1.6 Who will be responsible for implementing this proposal (Officer and/or Team): Liz Watts

# Section 2: Proposal to be Assessed

2.1 Type of proposal:

Project

If other, please specify

Click or tap here to enter text.

2.2 Is the proposal:

New

2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):Click or tap to enter a date.



2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Max 250 words)

South Cambridgeshire District Council (SCDC) carried out a four-day week pilot (4DW) between January 2023 and the end of March 2024. Four-day week working has continued at the Council since the end of the trial period. As part of the decision-making process to decide on the future of the 4DW for officers employed by the Council, the Council has committed to carrying out a consultation. This consultation will be carried out digitally. It will aim to understand if and/or how respondents' experience with Council services has been impacted by the 4DW, as well as respondents' views on the 4DW itself. As part of the consultation there will be three separate surveys, which will run for eight weeks:

- 1. A targeted external survey to meet our Best Value Duty requirements
- 2. A general external survey of residents and businesses
- 3. Statistically valid survey of residents and businesses

Alongside these surveys, internal staff views will also be collated.

This EqIA will specifically be looking at the process behind the consultation, rather than the options being put forward within the consultation itself, with the proposed options being subject to a separate EqIA. This is to ensure that the proposed method of consultation is appropriate for all groups and that the consultation is capturing as many responses from as many groups as possible, allowing any future decision on the Council's approach to recruitment and retention to be fully informed. As such, the proposed consultation takes a range of measures to maximise the ability of people to respond, such as providing physical copies of the consultation, making sure that any system used to gather responses is fully accessibility compliant, and continuous equalities monitoring.

2.5 Which of the Council's equality objectives (as detailed in the Council's Equality Scheme) does this proposal link to or help to achieve?
□ Identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community



□ SCDC is an employer that values difference and recognises the strength that a diverse workforce brings.

Protected characteristic groups have a voice and are represented in forming the future shape of the district.

 $\Box$  None.

- 2.6 Which groups or individuals will the proposal affect:
  Service Users □Councillors
  External Stakeholders □Other
  Employees
  If other, please specify Click or tap here to enter text.
- 2.7 Broadly speaking, how will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later in the form) (max 250 words)

The public's ability to be heard during consultation relies on their ability to respond. When individuals and groups are unable to respond, for whatever reason, the consultation risks not accurately capturing the full range of public opinion. This ultimately undermines the validity of any final decision made as a result of the consultation, as well as increasing the possibility of unintended negative consequences towards potentially already vulnerable groups. As such, it is the Council's responsibility to ensure that we are not inadvertently disenfranchising any groups by accidentily creating barriers to response and we should take actions that reflect the significance of council decision making on our residents and service users.

2.8 If any part of the proposal is being undertaken by external partners, please specify how the Council will ensure that they will meet equality standards? (Max 250 words)



There will be up to two external partners involved in the 4DW consultation process, though these have yet to be appointed. These external partners will be involved in:

- 1. The creation and delivery of a statistically valid survey.
- 2. The independent analysis of the data collected as part of the consultation exercise.

There is potential for one company to complete both tasks, but this would be explored as part of the procurement exercise. Additionally, as part of this same procurement exercise, we will ensure that companies are aware of their requirements to act in line with the Equality Act (2010) and will encourage them to monitor their own equalities impact. Furthermore, should any issues around the suppliers approach to equalities be raised, we will act accordingly to ensure that they continue to be aligned to the Council's equalties values.

Additionally, the digital surveys, which will be carried out as part of the consultation, will be hosted on the third-party consultation platform GoVocal. This platform is fully compliant with WCAG 2.2 accessibility standards and will help us to better engage with, and monitor our engagement with, our residents and businesses, including underrepresented groups.

# **Section 3: Evidence and Data**

3.1 Describe any work you have done (this could include consultation) to understand any effects on groups of people, including those within <u>9 protected</u> <u>characteristic groups?</u> Please list any key sources (e.g. web-search, previous versions of document, customer feedback etc) that you used to reach your conclusions.

(Max 250 words)

To ensure that the consultation design was robust, it was decided that a consultation expert would be appointed to support with process design, including with any equalities-based queries. General equalities advice has



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also been sought from the Council's Policy and Performance Officers who have previous experience with reviewing proposed consultation processes and have advised on where we can improve our process. Additionally, stakeholder mapping has also been carried out, allowing us to identify potential barriers to engagement for groups which we may need to resolve.

3.2 If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place.

(Max 250)

Future engagement will take place with the Leader of the Council, who will make the final decision on launching the consultation, as stated within the Council's constitution.

# Section 4: Impact of proposal on those with protected characteristics

4.1 Please select all characteristics that may or will be impacted (positive or negative). When providing details of the impact please consider the following questions

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. (both the number of persons affected and the severity of the impact)
- you will be asked to set out actions to manage these impacts in the following question (4.2)

 $\boxtimes$ All - general to all protected Characteristics.

Details: The way in which we present our questions forms an important part of how or if people respond. Should questions be overly technical or written in a way which the general public find difficult to engage with, we are likely to receive responses that don't accurately answer the questions being asked or we will receive a more limited range of responses. To limit this risk and ensure that groups feel confident in



responding, the Council will be carrying out structural validity testing before the consultation goes live in order to ensure that the proposed questions are understood as intended.

Furthermore, the consultation will be written to ensure that it is able to be understood by a general audience. To ensure this is the case, the full consultation – including the introduction - will seek to achieve a Flesch-Kincaid Score which is as low as possible, indicating a low reading age. This reflects government guidance that digital content should be written with a reading age of nine, in line with the national average reading age. By doing so, we will allow more people to fully engage with the consultation in a way that is meaningful.

Finally, as part of our Best Value duties, we will be engaging with representative groups for underrepresented characteristics (such as Cambridge Council for Voluntary Services, Age UK etc.). This will help drive up engagement with these groups and will allow us to ensure that we are providing a full range of view points to decision makers.

#### ⊠Age

Details: It is acknowledged that older adults are more likely to struggle to engage with consultations carried out within a digital space, with 20% of households with one adult aged 65 or over not having an internet connection, with 23% of older adults using the internet less than weekly or not at all within the last three months (ONS, 2020). Additionally, Age UK (2023) found that among people aged 65 and over, 1 in 5 were unable to fill in forms online. As such, it is important the Council makes effort to ensure that they are not excluded. This is detailed in the section on Digital Inclusion further down the document. It is also important to note that these issues are not limited to older adults, and that younger people also have barriers to accessing digital content even if they have the technical skill to do so, as revealed during the COVID-19 Pandemic.

#### ⊠Disability



Details: Within South Cambridgeshire, 14.8% of individuals identify as disabled under the Equality Act (Census, 2021). To ensure that individuals with disabilities are able to access our digital content should they so wish, all digital content will be to WCAG 2.2 accessibility standards. Additionally, alternative forms of engagement with the consultation will be provided to allow as many people as possible to successfully engage with us. This will include the provision of physical copies on request (that can be made into large text versions if needed), and assisted completion of the consultation by the contact centre if needed. This will also apply to the internal staff survey.

Gender reassignment

Details: Click or tap here to enter text.

□ Marriage and Civil Partnership

Details: Click or tap here to enter text.

□ Pregnancy and maternity

Details: Click or tap here to enter text.

⊠Race

Details: Additionally, language plays a significant part in if people can reply. According to the 2021 Census, the majority of residents within South Cambs (93.20%) speak English as their first or preferred language, with Polish (0.73%), Romanian (0.46%), Spanish (0.45%), and Italian (0.38%) making up the rest of the top five. In total, there are an estimated 30 languages where over 100 people have identified it is their preferred language. Additionally, due to the fact the census data provides a snapshot at the point at which it is collected, there are likely to be some instances of under-reporting. For example, only 21 individuals reported their first or preferred language to be Ukrainian during the 2021 Census. However, due to the onset of the Ukraine War in 2022, the Ukrainian speaking population of South Cambridgeshire has grown significantly – with South Cambs taking on over 900 Ukrainian refugees since the census was completed. To ensure that everyone is able to respond, the Council will make available translated documents upon request, working with our translation partner AA Global Services to make these available.



Additionally, our digital consultation platform, GoVocal, has in-built translation capabilities to empower individuals to digitally respond where possible.

Religion and belief
Details: Click or tap here to enter text.
Sex
Details: Click or tap here to enter text.
Sexual orientation
Details Click or tap here to enter text.
None of the above

#### 4.2 Other characteristics

Some characteristics are not yet protected in law, but the Council has made declarations it will consider them in policy making.

#### Digital inclusion (what is this?)

Details: The Council recognises that measures are needed to ensure that running a digital-first consultation does not alienate groups. Whilst the number of adults described as "internet non-users" has been decreasing steadily over recent years (ONS, 2019), a report by OFCOM in 2022 found that the number of households without access to the internet was around 6%, with access to the internet not being the only factor contributing to digital exclusion. Of those without access to the internet at home, the groups that are most likely to be affected are those aged 75 or over (26%), those in the DE socio economic classification (i.e., semi-skilled, unskilled, or casual workers or those on state benefits only; 14%), and those who are out of work (13%). This is important to recognise as the individuals within these categories are more likely to need to engage with some Council services.

To ensure that all residents can engage meaningfully with the process, hard copies



of any digital content will be provided on request. This will be available to collect from South Cambs Hall or can be sent out to residents or businesses via post. Additionally, paper copies of the internal staff survey will be made available at the Depot. This is because Waste Operatives do not have a Council email address and therefore are more likely to be digitally excluded.

□ Care experience (what is this?)

Details: Click or tap here to enter text.

 $\boxtimes$  Rurality

Details South Cambridgeshire is largely a rural district, consisting of over 100 villages. By running the consultation online, this allows individals from more rural locations to engage with consultation as they do not have to travel to physical locations to do so. Whilst internet access in more rural areas is slower than that of urban areas, only 0.9% of rural households across England do not have access to decent broadband (DEFRA, 2020). As such, the negative impact of a digital-first consultation should be minimal in terms of poor digital access caused by rurality and any negative impact is inherently offset by the efforts outlined in the digital inclusion section above.

 $\Box$  Socio-economic

Details Click or tap here to enter text.

4.3 Considering the above impacts you have identified above, please detail any actions (specific or general) which may help to enhance or mitigate impacts. Please include the timescale for completing the action.

Action and timescale	Officer
Different versions of the consultation will be available on	Michael Hill
request to support residents engagement with the process.	
This includes hard copies and translated documents.	
Click or tap here to enter text.	Click or tap here to
	enter text.



Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.

4.4 How will you monitor that the above actions have been completed and that this proposal, once implemented, is impacting fairly on everyone it affects? In answering this question, please include information about feedback you will seek and/or data you will collect and analyse, and how often you will do this

The consultation project plan will ensure that the actions within this EqIA are carried out.

# Section 5: Summary

5.1 Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding how to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Max. 250 words)

The public's ability to be heard during consultation relies on their ability to respond. When individuals and groups are unable to respond, for whatever reason, the consultation risks not accurately capturing the full range of public opinion. The Council recognises its duty to carry out a meaningful consultations in a way that enables all of our residents to engage successfully. We recognise the importance of providing physical copies, translated documents, and accessible systems and will endeavour to do so at all opportunities.

5.2 Confirm the recommendation of the officer completing the EqIA:

 $\boxtimes$  Proceed with the proposal (with any actions identified as required within Section 4 of the EqIA). Analysis demonstrates that the proposal is robust, we



have taken all appropriate opportunities to advance equality and foster good relations between groups.

□Reject the proposal: Analysis demonstrates that the proposal will cause unlawful discrimination and it must be removed or changed

# Section 6: Sign Off

- 6.1 Signature of individual completing EqIA: Michael Hill
- 6.2 Date of completion: 06/11/2024

6.3 When will this proposal next be reviewed and who will this be? (when in doubt 3 years minimum)

n/a - process is only happening once.

6.4 Approving officer signature \*, this should be your Head of Service, Service Area Manager, or Project Sponsor:

Liz Watts

6.5 Date of approval: 06/11/2024

Please send the completed document to <u>Equality.Schemes@scambs.gov.uk</u> for publishing on the website.

\*in the event that this EqIA is completed by Head of Service, then no additional approving signature is required.