

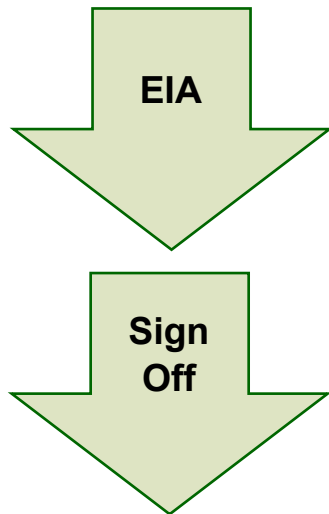
## Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

## APPENDIX 3

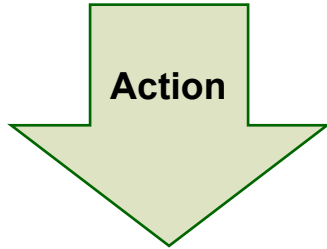
The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team via [equalities@warwickshire.gov.uk](mailto:equalities@warwickshire.gov.uk), or if it's relating to health inequalities, please contact Public Health via [padmin@warwickshire.gov.uk](mailto:padmin@warwickshire.gov.uk).



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.
- Brief the relevant Director for sign off and upload the completed form here: [Upload Completed Equality Impact Assessments](#). Please name it “EIA [project] [service area] [year]”
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.



- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

### Section One: Essential Information

<b>Service / policy / strategy / practice / plan being assessed</b>	<p>Unitary Local Government in Warwickshire – Submission of Interim Plan to be considered by Cabinet on 6 March 2025</p> <p>This EQIA follows on from the EQIA prepared in relation to the Leader Decision taken on 10 January 2025 in relation to the English Devolution White Paper</p>
<b>Business Unit / Service Area</b>	<p>Warwickshire County Council</p>
<b>Is this a new or existing service / policy / strategy / practice / plan?</b>  If existing, please state date of last assessment.	<p>New</p>

<p><b>EIA Authors</b></p> <p><b>N.B.</b> It is best practice to have more than one person complete the EIA to bring different perspectives to the table.</p>	<p>Nichola Vine, Sarah Duxbury</p>
<p><b>Do any other Business Units / Service Areas need to be included?</b></p>	<p>No</p>
<p><b>Does this EIA contain personal and / or sensitive information?</b></p>	<p>No</p>
<p><b>Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?</b></p>	<p>There may be some residents opposed to the principle of local government reform from a two-tier County and District/Borough model to a single tier unitary model (of one or more unitary councils). However, the decision is a matter of Government policy and the Council is required to respond by submitting an Interim Plan following an invitation letter received from the Minister for Housing Communities and Local Government pursuant to powers of the Secretary of State under Part 1 of the Local Government and Public Involvement in Health Act 2007.</p>

**1. Please explain the background to your proposed activity and the reasons for it.**

On 16 December 2024, the Government published a policy paper entitled “English Devolution White Paper”. The White Paper focuses on two areas of reform (i) widening devolution across England through the creation of Strategic Authorities to which centrally held Government powers would be devolved and (ii) a programme of Local Government reorganisation to create new unitary Councils, simplifying the current “multi-level” structure of local government in two-tier areas.

Warwickshire was not identified by Government in the initial wave of Councils moving forward with devolution / local government reorganisation. However, on 5th February 2025 the Minister of State for Local Government and English Devolution wrote to the Leaders of the six Councils in Warwickshire to invite them officially to work together to develop a joint submission with proposal(s) for local government reorganisation in their area. The letter constitutes a statutory invitation which the Secretary of State for Housing, Communities and Local Government has issued in exercise of powers under Part 1 of the Local Government and Public Involvement in Health Act 2007.

The report to which this EQIA relates covers the response to that statutory invitation which requires Interim Plan(s) to be submitted by 21 March 2025. Detailed proposals will be required to be submitted by 28 November 2025 and a further EQIA will be undertaken to evaluate the final proposals put forward at that time.

Please outline your proposed activity including a summary of the main actions.

The intention is to recommend that Cabinet authorise the submission to government of an Interim Plan for unitary local government for Warwickshire by 21 March 2025 based on an outline appended at Appendix 1 to the Cabinet report, with authorisation for the Chief Executive in consultation with the Leader of the Council to finalise that plan for submission.

It should be borne in mind that the Interim Plan stage is very much the initial stage. It is not a decision or evaluation point. It is expected that Government will provide feedback on the Interim Plan(s) which will then inform development of detailed proposals which are due to be submitted in November. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final submissions are developed for submission in November.

Recognising that more detailed work and additional evidence will need to be collated to inform the development of the final detailed proposals, the Council will also engage with stakeholders, partners, staff and Warwickshire residents during the process.

In respect of the Council's public sector equality duty under the Equality Act 2010, it is considered unlikely that the decision proposed and the matters contained in the March report will have any material impact and as such there are not considered to be any specific equalities implications arising from this report. It may be that such implications arise as this matter proceeds, particularly in the formulation of the more detailed proposals but they will be assessed and considered as appropriate at that time.

## 2. Who is this going to impact and how?

Under the Equality Act 2010 public sector bodies have a duty to consider the public sector equality duty (PSED) in their decision making. The PSED has been considered in the context of the proposed decision.

As noted above, it is too early to predict the full impacts of any change to local government structures for Warwickshire, and it is considered unlikely that the decision proposed at this stage and the matters contained in this report will have any material impact

A further EQIA will be undertaken as the proposals are developed and finalised for submission in November 2025.

### **Section Two: Evidence**

Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

#### **A – Quantitative Evidence**

**This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.**

It is too early to predict the impacts of local government reform. The recommendation within the March Cabinet report is not a decision or evaluation point. It is expected that the Government will provide feedback on the Interim Plan(s) which will help to inform development of the detailed proposals. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final submissions are developed for submission in November.

#### **B – Qualitative Evidence**

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

It is too early to predict the impacts of local government reform. The recommendation within the March Cabinet report is not a decision or evaluation point. It is expected that the Government will provide feedback on the Interim Plan(s) which will help to

inform development of the detailed proposals. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final submissions are developed for submission in November.

**Section Three: Engagement**

Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click [here](#).

<p><b>Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into account their protected characteristics and socio-economic status?</b></p>	<p>There is ongoing dialogue with the District and Borough Councils regarding the implications of the Government's White Paper policies.</p> <p>In formulating the outline Interim Plan submission, regard has been had to the debate at full Council on 18<sup>th</sup> February 2025 and the contributions made by the cross-party Member Working Group established following full Council to establish to support this work.</p> <p>By the time of submission, the working group will have met on two occasions and its representations will help to inform the final Interim Plan submission. Thereafter the cross-party working group will play an important part in developing the detailed proposals for submission by 28<sup>th</sup> November 2025.</p> <p>The approach to the submission of interim plans has also been discussed with the Leaders and Chief Executives of the five Warwickshire District &amp; Borough Councils. It has been agreed that interim plans will be submitted to Government within a single Warwickshire 'envelope' regardless of how many interim plans are compiled, and whether they are competing.</p>
	<p>See above</p>

<b>If YES, please state who with.</b>		
<b>If NO engagement has been conducted, please state why.</b>	Further engagement will take place between March and the submission of detailed proposals in November 2025.	
<b>How was the engagement carried out?</b>	<b>Yes / No</b>	<b>What were the results from the engagement? Please list...</b>
<b>Focus Groups</b>		
<b>Surveys</b>		
<b>Public Event</b>		
<b>Displays / Exhibitions</b>		
<b>Other (please specify)</b>		
<b>Has the proposed activity changed as a result of the engagement?</b>		See above
<b>Have the results of the engagement been fed back to the consultees?</b>		See above
<b>Is further engagement or consultation recommended or planned?</b>		See above

**What process have you got in place to review and evaluate?**

## Section Four: Assessing the Impact

### Protected Characteristics and other groups that experience greater inequalities

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g. health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

**N.B** In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	<b>Impact type (+) (=) (-) or (+&amp;-)</b>	<b>Nature of impact including health inequalities</b> Will your proposal have negative or positive implications for each group, including on health inequalities?	<b>Mitigating Actions for Negative Impacts</b> What can you do to mitigate any identified negative impacts or health inequalities? Use this column to form the basis of Section 6.
<b>Age</b>	The Council is required as a result of the Government invitation to submit an Interim		



	Plan for a unitary local government in Warwickshire. At this stage it is not considered that any specific equalities implications arise. Once there is clarity on final proposals, a further impact assessment will be carried out and a clearer view taken on the impacts on those who share characteristics protected by the Equality Act 2010.		
<b>Disability</b> Consider: <ul style="list-style-type: none"> <li>• Physical disabilities</li> <li>• Sensory impairments</li> <li>• Neurodiverse conditions (e.g. dyslexia)</li> <li>• Mental health conditions (e.g. depression)</li> <li>• Medical conditions (e.g. diabetes)</li> </ul>	As above		
<b>Gender Reassignment</b>	As above		

<b>Marriage and Civil Partnership</b>	As above		
<b>Pregnancy and Maternity</b>	As above		
<b>Race</b> Including: <ul style="list-style-type: none"> <li>• Colour</li> <li>• Nationality</li> <li>• Citizenship</li> <li>• Ethnic or national origins</li> </ul>	As above		
<b>Religion or Belief</b>	As above		
<b>Sex</b>	As above		
<b>Sexual Orientation</b>	As above		
<b>Groups who may require support:</b> <ul style="list-style-type: none"> <li>• Individuals who suffer socio-economic disadvantage</li> <li>• Armed Forces (WCC signed the <a href="#">Armed Forces Covenant</a> in June 2012)</li> <li>• Carers</li> <li>• Homelessness</li> </ul>	As above.		

<ul style="list-style-type: none"> <li>• People leaving Prison</li> <li>• People leaving Care</li> </ul>			
<p><b>Other Identified Health Inequalities (HI)</b>        Many issues can have an impact on health: is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc.</p>	As above		
<p><b>Other Groups</b>        If there are any other groups</p>	As above		

**Public Sector Equality Duty (PSED)**

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	<b>Evidence of Due Regard</b>
<p><b>Eliminate unlawful discrimination (harassment, victimisation and other prohibited conduct):</b></p>	<p>It is too early to predict the impacts of local government reform. The recommendation within the March Cabinet report is not a decision or evaluation point. It is expected that Government will provide feedback on the Interim Plan(s) which will then inform development of detailed proposals which are due for submission by 28th November 2025. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final proposals are developed for submission.</p>
<p><b>Advance equality of opportunity:</b></p> <p>This involves</p> <ul style="list-style-type: none"> <li>removing or minimising disadvantages suffered by people due to their protected characteristics;</li> <li>taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities;</li> <li>encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.</li> </ul>	<p>As above</p>
<p><b>Foster good relations:</b></p>	<p>As above</p>

This means tackling prejudice and promoting understanding between people from different groups and communities.

### Section Five: Partners / Stakeholders

Which sectors are likely to have an interest in or be affected by the proposed activity?	Yes / No	Describe the interest / affect
<b>Businesses</b>		It is too early to predict the impacts of local government reform. The recommendation within the March Cabinet report is not a decision or evaluation point. It is expected that Government will provide feedback on the Interim Plan(s) which will then inform development of detailed proposals which are due for submission by 28th November 2025. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final proposals are developed for submission.
<b>Councils</b>		
<b>Education Sector</b>		
<b>Fire and Rescue</b>		
<b>Governance Structures</b>		
<b>NHS</b>		
<b>Police</b>		
<b>Voluntary and Community Sector</b>		
<b>Other(s): please list and describe the nature of the relationship / impact</b>		

### Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four, please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. It is also important to consider how often this E.I.A. will be reviewed, and who is responsible for doing this. If you are not taking any action to support or mitigate the impact, you should complete the No Mitigating Actions section below instead.

### **Mitigating Actions**

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible

### **No Mitigating Actions**

**Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.**

It is too early to predict the impacts of local government reform. The recommendation within the March Cabinet report is not a decision or evaluation point. It is expected that Government will provide feedback on the Interim Plan(s) which will then inform development of detailed proposals which are due for submission by 28th November 2025. Therefore, the impacts at this stage are difficult to quantify and will need to be reconsidered when final proposals are developed for submission.

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**Section Seven: Assessment Outcome**

<b>Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.</b>		
<b>No major change required</b>		As the report is responding to a statutory invitation and is not a decision or evaluation point at this stage, it is considered unlikely that the recommendation proposed and the matters within the report will have a material impact on the Council’s public sector equality duty. Therefore, there are not considered to be any specific equalities implications arising from the report. As final proposals develop such implications may arise and will be assessed and considered at that time.
<b>The proposal has to be adjusted to reduce impact on protected characteristic groups and/or health inequalities</b>		
<b>Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities</b>		

<b>Stop the proposal as it is potentially in breach of equality legislation</b>		
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**Section Eight: Sign Off**

**N.B** To be completed after the EIA is completed but before the area of work commences.

<b>Name of person/s completing EIA</b>	Nic Vine – Head of Legal and Governance
<b>Name and signature of Director</b>	Sarah Duxbury – Director of Strategy, Planning and Governance
<b>Date</b>	21 February 2025
<b>Date of next review and name of person/s responsible</b>	28 November 2025

Once signed off, please ensure the EIA is uploaded using the following form. Please name it “EIA [project] [service area] [year]”: [Upload Completed Equality Impact Assessments](#)

These will be stored on a [Sharepoint library](#) which Warwickshire County Council colleagues can access.



**It is the responsibility of the individuals and teams who completed the EIA to review it regularly and to carry out any required activities in line with the action plan made.**

**For advice or support, please contact [equalities@warwickshire.gov.uk](mailto:equalities@warwickshire.gov.uk).**