

30 JUNE 2026

REPORT NO. ED2610

KEY DECISION? NO

EQUALITY, DIVERSITY AND INCLUSION POLICY AND ACTION PLAN

SUMMARY AND RECOMMENDATIONS:

This report presents the finalised Equality, Diversity and Inclusion (EDI) Policy and supporting Equality Action Plan for consideration and approval by Cabinet.

The policy has been developed through engagement with stakeholders, analysis of local insight (resident feedback, ward data, service complaints) and organisational learning. It aligns with the Equality Framework for Local Government and fulfils the Council's duties under the Equality Act 2010.

The action plan delivers the policy's five strategic goals (EP1–EP5) covering community insight, accessible services, community cohesion, an inclusive workforce, and governance/accountability. A phased approach to 2028 is proposed, with early 'quick wins' to be implemented within six months.

- ii. Agree the Equality, Diversity and Inclusion Policy (Appendix 1).
- ii. Note the quality, Diversity, and Inclusion Action Plan (Appendix 2)
- iii. Note that the annual Public Sector Equality Duty Update report will be published on the council website, with the next report due in October 2026.

1. INTRODUCTION

- 1.1. This report presents the Council's Equality, Diversity and Inclusion (EDI) Policy and supporting Action Plan for approval.
- 1.2. The Policy sets out the Council's strategic approach to promoting equality, reducing inequality and ensuring that services, decision-making and organisational culture are inclusive and responsive to the needs of the borough's diverse communities.
- 1.3. The Policy has been developed using a range of evidence, including workforce data, service insight, resident feedback and engagement activity. This ensures that the approach is informed by a clear understanding of community need and organisational experience.

- 1.4. The Policy is supported by an Equality Action Plan which sets out specific actions, responsibilities and monitoring arrangements to support delivery over time.

2. BACKGROUND

- 2.1. Rushmoor Borough Council serves a diverse population and recognises that people experience services and opportunities differently depending on their circumstances, including protected characteristics and wider factors such as language, income and digital access.
- 2.2. The Council has a statutory duty under the [Equality Act 2010](#) and the Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity and foster good relations between communities.
- 2.3. Previous engagement and service insight have identified a number of key challenges, including the need to improve access to services, strengthen the use of data to understand inequalities, and ensure that equality is consistently considered in decision-making.
- 2.4. The development of the EDI Policy provides an updated and consolidated framework to address these issues, ensuring that equality, diversity and inclusion are embedded across governance, service delivery and organisational culture.
- 2.5. The Policy also aligns with the Council's [wider priorities](#) and prepares the organisation for future changes, including Local Government Reorganisation, by strengthening governance, accountability and evidence-based decision-making).

3. THE EDI POLICY AND ACTION PLAN

- 3.1. The Equality, Diversity and Inclusion (EDI) Policy, attached in Annex 1, sets out the Council's strategic direction and principles for equality. It establishes five priorities:
 - EP1 – Understanding Inequality and Community Experience
 - EP2 – Accessible, Inclusive and Fair Services
 - EP3 – Inclusive Communities and Community Cohesion
 - EP4 – Inclusive Workforce and Organisational Culture
 - EP5 – Leadership, Governance and Accountability
- 3.2. The Equality Action Plan, attached in Annex 2, supports delivery of the Policy and includes more than 30 actions. These actions are assigned to service leads and supported by defined timescales, measures and data sources to enable monitoring and accountability.

3.3. Actions are phased to support delivery:

- Early actions (within 0–6 months) focus on establishing key foundations and quick wins improvements to website accessibility and delivery of Staff Connect sessions.
- Medium and longer-term actions (through to 2028) focus on more substantive changes, including refreshing the Young People's Plan, increasing the use of social value in procurement and improving workforce representation and progression.

3.4. The Policy and Action Plan apply across all Council services and functions, including decision-making, procurement and partnership working. They cover the whole borough and reflect the requirements of the Equality Act 2010, alongside locally identified priorities.

Consultation

3.5. The EDI Policy has been developed through targeted engagement with internal and external stakeholders. This included 23 staff members through workshops, surveys and discussions, 4 elected Members, and 4 voluntary, community and social enterprise (VCSE) organisations.

3.6.

3.7. In addition, discussions were held with 3 neighbouring councils to review good practice and benchmark approaches.

3.8. The development of the Policy has been supported by analysis of [workforce data](#), service insight, complaints data and [resident feedback](#), [alongside existing consultation findings](#).

3.9. Consultation identified several consistent themes, including the need to strengthen leadership and accountability for equality, improve the use of data and evidence, ensure more consistent application of [Equality Impact Assessments](#), and improve the accessibility of services and communication.

3.10. Feedback from staff highlighted the importance of maintaining an inclusive organisational culture, including clearer development opportunities, stronger leadership expectations and continued focus on wellbeing and inclusion.

3.11. Additionally, feedback from the Policy and Projects Advisory Board on 09 June highlighted the importance of strengthening the policy's coverage of neurodiverse residents and recognising communities supported under the Armed Forces Covenant. Members also emphasised the need for outcome-based measures within the Action Plan to ensure that progress is clearly demonstrated and that improvements in equality outcomes are visible to residents. The Action Plan will be updated to reflect this feedback in due course.

4. IMPLICATIONS (of proposed course of action)

Risks

- 4.1. There is a risk that the Council does not meet its obligations under the Equality Act 2010 if equality considerations are not embedded effectively. The Policy strengthens governance, accountability and decision-making processes to mitigate this.

Legal Implications

- 4.2. While the policy itself does not create additional statutory duties beyond those already imposed by law, failure to meet duties under the Equality Act 2010 or demonstrate due regard to the Public Sector Equality Duty risk legal challenge and complaints.
- 4.3. Adopting the policy strengthens the Council's compliance with the Equality Act, Public Sector Equality Duty and duties relating to service accessibility and employment. It also creates a clear framework to evidence due regard in decision-making through equality impact assessments and mitigates the risk of discrimination, harassment, victimisation and any other conduct prohibited by or under the Act.

Abi Khan, Deputy Head of Legal Services & Deputy Monitoring Officer, abi.khan@rushmoor.gov.uk

Financial Implications

- 4.4. There are no direct financial implications from this report. Delivery of the action plan will be met from current council resources. If further financial resource is required, further approvals will be sought.

Rosie Plaistowe-Melham, Financial Services Manager & Deputy S151

Resource Implications

- 4.5. There are no additional staffing or resource implications arising directly from this report. Delivery of the Equality, Diversity and Inclusion Policy and Action Plan will be met from existing officer capacity across services. The Action Plan allocates responsibility to service leads and will be delivered through existing work programmes.

Equalities Impact Implications

- 4.6. A screening assessment was undertaken, and it was determined that a full Equalities Impact Assessment is not required because the impacts are positive or neutral. See Annex 3.

LIST OF APPENDICES/ANNEXES:

- Annex 1 - Equality, Diversity and Inclusion Policy
- Annex 2 - Equality, Diversity and Inclusion Action Plan
- Annex 3 - Equality Impact Assessment

BACKGROUND DOCUMENTS:

- [The Equality Act 2010](#)
- [Workforce Data](#)
- [Results from Consultations](#)
- [Council Delivery Plan](#)
- [Equality, Diversity, and Inclusion](#)

CONTACT DETAILS:

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Equality, Diversity and Inclusion Policy

Our Policy

Rushmoor Borough Council is committed to putting diversity and inclusion at the heart of everything it does. This policy reflects engagement with stakeholders, analysis of local insight and organisational learning, and has been informed by the Equality Framework for Local Government. It sets out how we will strengthen trust with our diverse communities, improve access to services, and create a culture where fairness and inclusion are central to how decisions are made.

The Council's policy goals are to:

- To be compliant with the Public Sector Equality Duty
- To be an inclusive employer of a diverse workforce that reflects the local community
- To deliver accessible, inclusive, and responsive services to all residents in the borough
- To foster a welcoming and inclusive community where all residents feel their voices are heard and can influence decision-making

To achieve these goals, the Council will:

- Understand the experiences of residents across the borough so that services and policies respond to the needs of different communities.
- Design and deliver council services to be inclusive, accessible and fair.
- Work with partners, community organisations and residents to support inclusive communities where people feel connected, respected and able to participate in local life.
- Have a workplace culture where colleagues feel supported, respected and able to succeed.
- Have clear roles and responsibilities for equality across services, ensuring that accountability for equality is clearly understood and embedded within service delivery and decision making.

This policy supports the Council to meet its Public Sector Equality Duty under the Equality Act 2010 to:

- eliminate discrimination and reduce inequality
- advance equality of opportunity
- foster good relations between communities

The Council also recognises that some groups may experience barriers that are not explicitly covered within the Equality Act 2010. The Council will continue to strengthen its understanding of these

groups through data, engagement and service insight to ensure services are inclusive and responsive to need.

This Policy may be supplemented by a series of Codes of Practice which provide further support and guidance in specific areas.

EP1 – Understanding Inequality and Community Experience

The Council will strengthen its understanding of the experiences of residents across the borough, so that services and policies respond to the needs of different communities.

This will involve improving how insight from residents, partners and community organisations is gathered. By bringing together survey findings, engagement feedback and local data, the Council will build a clearer picture of how people experience life in Rushmoor and where inequalities exist.

Key areas of focus will include:

- use resident feedback and consultation insight to inform decision-making
- use ward level data and demographic insight to identify inequalities affecting different areas
- engage with groups whose voices may be under-represented to ensure a broad range of perspectives are considered
- use feedback, complaints and service demand data to identify emerging issues and inequalities
- improve understanding of how different characteristics and circumstances can combine to affect people's experiences and outcomes

This will ensure that decisions are informed by a strong evidence base and a better understanding of lived experience.

EP2 – Accessible, Inclusive and Fair Services

The Council will ensure that council services are designed and delivered in ways that are inclusive, accessible and fair.

This includes considering equality early stage in service design and ensuring that residents can access support through clear, flexible and appropriate routes

Key areas of focus will include:

- have accessible digital services and council communications
- provide clear, consistent, easy-to-understand and culturally appropriate information about services and decisions
- improve how residents interact with customer services
- use service data, complaints and customer insight to identify barriers to access

- improve the availability of translated and culturally appropriate communications to ensure information is accessible and relevant to different communities.

This will result in services that are easy to access, better understood by residents and responsive to the needs of different communities.

EP3 – Inclusive Communities and Community Cohesion

The Council will work with partners, community organisations, and residents to support inclusive communities where people feel connected, respected and able to take part in local life.

This work will focus on strengthening relationships between communities and supporting initiatives that promote integration and well-being.

Key areas of focus include:

- support community cohesion activity and partnerships across the borough
- strengthen relationships with voluntary, community and faith organisations
- support refugee resettlement and integration programmes
- address health inequalities and improving access to wellbeing opportunities
- support opportunities for young people to engage in community life
- strengthen long-term partnerships with voluntary, community and social enterprise (VCSE) organisations and moving from one-off consultation towards ongoing collaboration

This will support stronger, more connected communities where residents feel included, represented and able to take part.

EP4 – Inclusive Workforce and Organisational Culture

The Council will continue to develop a workplace culture where colleagues feel supported, respected and able to succeed.

An inclusive workforce enables the Council to better understand the communities it serves and to deliver services that reflect the needs of residents.

Key areas of focus include:

- strengthen equality awareness and inclusive leadership practices
- support staff wellbeing and resilience
- ensure staff have the skills and confidence to work effectively with diverse communities
- support staff through organisational change
- use workforce data and staff feedback to understand employee experience.

This will contribute to a more inclusive workplace where staff feel valued, supported and able to progress.

EP5 – Leadership, Governance and Accountability

The Council will improve clarity of roles and responsibilities for equality across services, ensuring that accountability for equality is clearly understood and embedded within service delivery and decision making.

This includes ensuring that equality considerations are integrated at an early stage in the development of policies, strategies and projects supported by clear oversight and monitoring arrangements.

Our approach will include:

- strengthen the consistency and quality of Equality Impact Assessments and ensuring they are considered at an early stage in policy and decision making
- improve the use of equality information and service data to inform decisions
- strengthen governance arrangements and accountability for equality across services
- ensure procurement and partnership work support inclusive outcomes
- publish equality information and monitoring progress.
- support elected members to consider equality in their roles and in representing the diverse communities of the borough

This will ensure that equality is consistently considered in decision making and that accountability is clear across the organisation.

Delivering Change Over Time

This Equality, Diversity and Inclusion Policy sets the overall direction and principles that guide the Council's approach to equality. It is supported by an Equality Action Plan, which sets out the specific actions, measures and responsibilities for delivery.

The Council will take a phased approach to implementation:

- Early actions and quick wins will focus on strengthening foundations, improving clarity, and addressing known barriers. These will be progressed within the next six months and communicated separately to support pace and visibility.
- Medium- to longer-term actions will be delivered through the Equality Action Plan, with outcomes monitored regularly and activity continuing through to 2028, aligning with the transition to new unitary councils following Local Government Reorganisation.

This approach recognises that some improvements can be made quickly, while others require sustained effort to embed inclusive practice, strengthen governance, and support long-term culture change.

The Framework therefore provides continuity and direction, while the Action Plan enables flexible, accountable delivery as organisational structures evolve.

Additionally, the Equality Action Plan will continue to evolve to reflect feedback from stakeholders, including strengthening outcome-based measures and improving understanding of specific groups, to ensure that progress is clearly demonstrated and that improvements in equality outcomes are visible to residents.

Equality, Diversity and Inclusion Action Plan

EP1 — Understanding Inequality and Community Experience

The Council will strengthen its understanding of the experiences of residents across the borough, so that services and policies respond to the needs of different communities.

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
1.1	Conduct the Residents Survey and analyse equality related findings, including differences between groups where data is available	Policy, Strategy & Transformation	2026/27 survey cycle	% of residents satisfied with the way the council runs things	Residents Survey dataset
1.2	Analyse community cohesion indicators within the Residents Survey	Policy, Strategy & Transformation	Annual following survey publication	% residents who feel they belong to their local area	Residents Survey dataset
1.3	Analyse perceptions of relationships between communities	Policy, Strategy & Transformation	Annual following survey publication	% residents who feel people from different backgrounds get on well	Residents Survey dataset
1.4	Monitor democratic confidence indicators	Policy, Strategy & Transformation	Annual following survey publication	% residents who think the council acts on their concerns	Residents Survey dataset
1.5	Maintain and update ward data profiles to support equality analysis	Policy, Strategy & Transformation	Ongoing	Ward profiles updated and published on the council website	Council ward profile datasets

EP2 — Accessible, Inclusive and Fair Services

The Council will ensure that council services are designed and delivered in ways that are inclusive, accessible and fair.

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
2.1	Improve accessibility of the council website and digital services	Communications	Ongoing	Website accessibility score	Silktide accessibility monitoring platform
2.2	Improve website content accessibility and clarity to ensure information is easy to understand.	Communications	Ongoing	Website content accessibility score	Silktide content monitoring system
2.3	Improve accessibility and flexibility of customer services for residents with different needs.	Customer Services	Quarterly monitoring	Customer satisfaction score (1–5 scale)	Customer Services satisfaction survey dataset
2.4	Improve access to funding and business support opportunities for Nepali residents by ensuring key communications are clear, culturally appropriate, and available in Nepali where needed.	Economy and Growth	Ongoing	Qualitative feedback from Nepali businesses or community groups	Economy and Growth Team

EP3 — Inclusive Communities and Community Cohesion

The Council will work with partners, community organisations, and residents to support inclusive communities where people feel connected, respected and able to take part in local life.

Community cohesion and integration

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
3.1	Manage the Rushmoor Together partnership	Community & Partnerships	Ongoing	Number of Rushmoor Together activities delivered	Community & partnerships monitoring
3.2	Deliver community cohesion events in areas with lower engagement	Community & Partnerships	Ongoing	Number of cohesion events delivered	Community cohesion
3.3	Manage the Belong Network contract and programme	Community & Partnerships	Ongoing	Number of Belong Network activities delivered	Belong Network
3.5	Coordinate engagement with faith communities	Community & Partnerships	Ongoing	Number of Rushmoor Faith Leaders meetings held	Community & partnerships monitoring
3.6	Establish and support the Farnborough Together Churches group	Community & Partnerships	2026–2027	Number of Farnborough Together Churches meetings held	Community & partnerships monitoring

Refugee resettlement and integration

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
3.7	Continue work on the Afghan Resettlement Programme, including delivery and project management of the Afghan resettlement scheme	Community & Partnerships	Ongoing	Completion of the programme	Community & partnerships monitoring

3.8	Continue work on the Refugee Integration Programme, including delivery of cohesion and integration activity across the borough	Community & Partnerships	Ongoing	Completion of the programme	Community & partnerships monitoring
3.9	Continue work on Ukraine Resettlement Programme, including project management of the Homes for Ukraine scheme and supporting Ukrainian residents to integrate into the local community.	Community & Partnerships	Ongoing	Completion of the programme	Community & partnerships monitoring

Health Inequalities and Wellbeing

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
3.10	Deliver the Healthy Weights programme with Public Health partners	Community & Wellbeing	Ongoing	Participation in Healthy Weights programme activities	Healthy Weights programme monitoring (Community & partnerships monitoring)
3.11	Deliver the Active in Rushmoor campaign	Community & Wellbeing	Annual campaign	Delivery of 'Active in Rushmoor' campaign in Rushmoor	Active in Rushmoor monitoring dataset (Community & partnerships monitoring)
3.12	Promote access to sport and physical activity	Community & Wellbeing / Commercial Services	Ongoing	Leisure centre attendance and membership levels	Leisure centre management system (Leisure services software system)
3.13	Promote mental health awareness initiatives	Community & Wellbeing	Ongoing	Increase awareness of mental health provision	Community & partnerships monitoring
3.14	Deliver wellbeing events including Men's Mental Health Day	Community & Wellbeing	Annual	Delivery of Men's Mental Health Day	Community & partnerships monitoring

Youth Engagement and Participation

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
3.15	Develop and implement the Young People's Plan	Community & Partnerships	2026–2027	Refreshed Young People's Plan	Young People's Plan monitoring records (Community & Partnerships Team)
3.16	Deliver youth club activities at Prospect Youth Club and Aldershot Youth Club	Community & Partnerships	Ongoing	Youth attendance at clubs	Youth club attendance database (Community & Partnerships Team)
3.17	Deliver youth engagement through the Rushmoor Voices programme	Community & Partnerships	Ongoing	Number of youth engagement sessions delivered	Rushmoor Voices programme monitoring
3.18	Deliver work experience placements across council services	People Team	Ongoing	Maintain number of placements and receive positive feedback from participants	HR workforce monitoring

EP4 — Inclusive Workforce and Organisational Culture

The Council will continue to develop a workplace culture where colleagues feel supported, respected and able to succeed.

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
4.1	Support staff through Local Government Reorganisation	People Team	Ongoing	Staff feedback on transition experience	Staff pulse survey dataset
4.2	Deliver Staff Connect engagement sessions	People Team	Ongoing	Number of Staff Connect sessions delivered	HR engagement monitoring
4.3	Deliver resilience and change support sessions for staff	People Team	Ongoing	Delivery of resilience sessions	HR training monitoring system
4.4	Monitor staff wellbeing through Health and Wellbeing Survey	People Team	Survey cycle	Staff wellbeing survey results	Staff Health and Wellbeing Survey dataset
4.5	Provide equality and diversity learning opportunities	People Team	Ongoing	Participation in EDI learning sessions	HR training monitoring
4.6	Maintain mandatory training completion levels	People Team	Quarterly monitoring	% mandatory training completed	HR learning management
4.7	Monitor workforce recruitment, retention and progression trends across the organisation, with a focus on improving representation and progression for Nepali staff and other under-represented groups	People Team	Annual monitoring	Identified actions to address progression gaps/Workforce equality data reviewed annually	HR workforce monitoring
4.8	Monitor sickness absence trends	People Team	Quarterly monitoring	Working days lost due to sickness per FTE	HR workforce monitoring dataset

EP5 — Equality Governance and Evidence-Based Decision Making

The Council will improve clarity of roles and responsibilities for equality across services, ensuring that accountability for equality is clearly understood and embedded within service delivery and decision making.

Ref	Action	Service Lead	Timescale	Measure	Data Source (Location)
5.1	Deliver and implement the Equality Policy	Policy, Strategy & Transformation	By June 2026	Equality Policy approved by Cabinet	Cabinet decision records
5.2	Support Equality Impact Assessments for Cabinet decisions and ensure equality considerations are clearly presented to elected members	Policy, Strategy & Transformation	Ongoing	Number of Equality Impact Assessments completed Development of Policy and Strategy intranet page to help with equality impact assessments and policy guidance	Equality Impact Assessments (Policy Team)
5.3	Publish annual equality information	Policy, Strategy & Transformation	Annual	Equality information report published	Council website equality information pages
5.4	Increase use of social value weighting in procurement processes	Risk, Resilience & Procurement	Annual monitoring	% procurement activity over £5k with ≥10% social value weighting	Procurement contract register
5.5	Increase procurement opportunities for SMEs and VCSE organisations	Risk, Resilience & Procurement	Annual monitoring	% contracts awarded to SMEs or VCSE organisations	Procurement monitoring
5.6	Increase procurement opportunities for regional organisations	Risk, Resilience & Procurement	Annual monitoring	% contracts awarded to organisations in the Southeast region	Procurement contract monitoring

Equality Impact Assessment: Screening Tool

The **Equality Impact Assessment (EIA) Screening Tool** should be completed for any new proposal, plan or project. It helps staff check if their proposal will positively, neutrally, or negatively affect residents, staff, or service users. If the impact is positive or neutral, a full EIA isn't needed.

A **full EIA** is required if the screening shows a negative impact on specific groups. We also advise that a full EIA should be completed when a [key decision](#) is being made. Key decisions are executive actions likely to:

- Significantly affect Council tax, budget balances, or contingencies.
- Have a major impact on communities across two or more Borough wards.
- Expenditure or savings over £100,000 qualify as significant, with a £250,000 threshold for property transactions.

Furthermore, for staff, we generally consider the impact on more than 25 people as significant, which would require a full EIA. If you're unsure, you can seek guidance from the Policy Team.

***After screening, if you identify the need for a full Equality Impact Assessment, you can use your existing answers as a foundation for the full assessment.**

Name of Project	Equality, Diversity and Inclusion Policy and Action Plan 2026–2028
Reference number (if applicable)	
Service Area	Policy, Strategy and Transformation
Date screening completed	05/06/26
Screening author name	Martin Iyawwe
Policy Team sign off	Alex Shiell
Authorising Director/Head of Service name	Karen Edwards

1. Please provide a summary of the proposal

The Equality, Diversity and Inclusion (EDI) Policy sets out Rushmoor Borough Council's strategic approach to promoting equality, diversity and inclusion across its services, workforce and communities. The policy supports the Council in meeting its Public Sector Equality Duty under the Equality Act 2010 and establishes five priority themes:

- Understanding Inequality and Community Experience
- Accessible, Inclusive and Fair Services
- Inclusive Communities and Community Cohesion
- Inclusive Workforce and Organisational Culture
- Leadership, Governance and Accountability

The policy is supported by an accompanying Action Plan which sets out specific actions, measures and responsibilities for delivery through to 2028. The policy builds on the excellent work currently underway at the councils, consolidating it into one solid framework. The proposal does not deliver financial savings. Instead, it provides a framework for improving equality outcomes, increasing accessibility of services, strengthening community cohesion, supporting an inclusive workforce and ensuring equality considerations are embedded within decision making.

The policy applies across all council services and has relevance to residents, businesses, community organisations, staff, elected members and partner organisations across the borough.

2. Who will the proposal impact? Please indicate Yes or No

Group of people	Impacted?
Residents	Yes
Businesses	Yes
Visitors to Rushmoor	Yes
Voluntary or community groups	Yes
Council staff	Yes
Trade unions	Yes
Other public sector Organisations	Yes
Others	Please specify:

3. What impact will this change have on staff? Please complete where relevant:

The policy applies to all council staff and seeks to strengthen equality awareness, inclusive leadership, staff wellbeing and workforce diversity.

The proposal does not involve organisational restructuring, reductions in staffing levels, changes to employment contracts or relocation of staff. Any impact on staff is expected to be positive through improved support, development opportunities, inclusive working practices and greater consideration of equality issues within the workplace.

The policy affects all services across the council as equality considerations will be embedded into service delivery and decision making.

4. What consultation or engagement will you be leading (with residents, staff, or other stakeholders) as part of this project?

The Equality, Diversity and Inclusion Policy were developed through a consultation and engagement process involving internal and external stakeholders.

The consultation process included engagement with:

• 23 staff members through an internal equality survey, workshops and discussions. • 4 councillors through an internal equality survey. • 4 Voluntary, Community and Social Enterprise (VCSE) organisations through an internal equality survey, workshops and discussions. • 3 neighbouring councils through consultation discussions. • Review of organisational data, workforce information and service insight. • Consideration of resident feedback and existing consultation findings. In total, this represented engagement with 34 stakeholders across the organisation and borough. Feedback from consultation informed the development of the policy objectives, priorities and actions. Stakeholders highlighted the importance of improving accessibility, strengthening community engagement, embedding equality considerations within decision-making processes, supporting workforce inclusion and ensuring accountability for delivery. The policy itself does not require further consultation. Ongoing engagement and monitoring will take place through delivery of the Equality, Diversity and Inclusion Action Plan, resident surveys, workforce monitoring, customer feedback and engagement with community partners.
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5. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

Direct and indirect impacts

When completing this table, please consider both **direct and indirect impacts**, see helpful guidance.

Direct discrimination occurs when someone is treated less favourably than another person because of a **protected characteristic**. This includes:

- **Actual possession** of a protected characteristic.
- **Perceived possession** of a protected characteristic (discrimination by perception).
- **Association** with someone who has a protected characteristic (discrimination by association).

A valid comparison must show that someone without the protected characteristic would have been treated better in similar circumstances. It can still be direct discrimination even if the person treating you unfairly shares the same characteristic.

Note: Age discrimination may be lawful if it can be objectively justified. For other protected characteristics, direct discrimination is unlawful regardless of intent or justification.

Indirect discrimination happens when a **policy, rule, or practice** applies to everyone but puts people with a protected characteristic at a **particular disadvantage**. It occurs when:

- A policy is applied equally to all.
- It disadvantages a group sharing a protected characteristic.
- You are personally disadvantaged by it.
- The organisation cannot justify the policy as a proportionate means of achieving a legitimate aim.

If the policy can be objectively justified, it is not considered indirect discrimination.

For example: Closing public toilets may be an example of indirect discrimination, as it affects everyone but disproportionately disadvantages women, due to toilet frequency, alternative options and safety/hygiene factors.

Likely impact

For the groups identified earlier, tick the likely impact (both direct and indirect) on people with protected characteristics (e.g., age, disability, race, etc.):

- **Neutral:** No impact.
- **Positive:** Benefits people with protected characteristics.
- **Negative:** Harms people with protected characteristics.
- **Not Sure:** It's unclear how this affects people with protected characteristics, or more information is needed.

Rate the negative impact as **low**, **medium**, or **high**. Also, consider whether the proposal may be seen as controversial or negative by some groups. See the guidance for help.

Protected characteristic - Age

(for example, young people under 25, older people over 65)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy commits to improving understanding of inequalities, supporting youth engagement and ensuring services are accessible and responsive to residents of all ages. This is likely to have a positive indirect impact.

Protected characteristic – Disability

(include people with physical disabilities, people with learning disabilities, blind and partially sighted people, Deaf or hard of hearing people, neurodiverse people. This also includes carers.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy includes commitments to accessible services, accessible communications and improved customer access arrangements. This is likely to have a positive direct and indirect impact on disabled residents.

Protected characteristic - Gender reassignment and identity

(Include people who identify across the trans* umbrella, not only those who have undergone gender reassignment surgery. This is inclusive of girls and or/women, men and/or boys, non-binary and genderfluid people and people who are transitioning) *Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>

Yes		Choose an item.		The policy promotes an inclusive culture, equal treatment and reduced discrimination for all protected groups. Positive indirect impact.
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Protected characteristic - Marriage and Civil Partnership

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
	Yes	Choose an item.		No specific direct or indirect impacts identified.

Protected characteristic – Pregnancy and Maternity

(Include people who are pregnant in or returning to the workplace after pregnancy. Could also include working parents.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		Improved accessibility, workforce inclusion and fair service delivery may benefit people who are pregnant or have caring responsibilities. Positive indirect impact.

Protected characteristic – Race or ethnicity

(include on the basis of colour, nationality, citizenship, ethnic or national origins)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy includes commitments to engage under-represented groups, improve culturally appropriate communications and strengthen community cohesion. Positive direct and indirect impact.

Protected characteristic – Religion or belief

(include no faith)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy supports engagement with faith communities and community cohesion activity. Positive direct and indirect impact.

Protected characteristic - Sex

(Under the Equality Act 2010 and following the 2025 Supreme Court ruling on 15 April 20205, a person's legal sex is defined as their biological sex as recorded at birth. Trans individuals are still protected from discrimination under the characteristic of gender reassignment.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
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Yes		Choose an item.		The policy promotes fair access to services, equality of opportunity and inclusive employment practices. Positive indirect impact.
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Protected characteristic - Sexual Orientation

(Include people from across the LGBTQ+ umbrella, for example, people who identify as lesbian, gay, bisexual, pansexual or asexual.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy promotes inclusion, dignity and respect for all individuals. Positive indirect impact.

Protected characteristic - Other

(e.g. people on low incomes, people living in poverty, looked after children, people with care experience, people who are homeless, people with mental health problems, people who are prison leavers, people affected by menopause, people affected by menstruation and/or period poverty)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes		Choose an item.		The policy seeks to understand and address wider inequalities experienced by disadvantaged residents, including refugees, people on low incomes and those experiencing poor wellbeing. Positive indirect impact.

6. Screening Decision

Outcome	Yes or No
Neutral or Positive – no full EIA needed*.	Yes
Negative – Low Impact – full EIA at the service director's discretion*.	No
Negative – Medium or High Impact – must complete a full EIA.	No
Is a full EIA required? Service decision:	No
Is a full EIA required? [Policy Team] sign off recommendation:	No
Flag for DPIA (will include engagement that collects personal data). [Policy Team]:	No
Flag for ethics (high risk/ will involve engagement with vulnerable residents):	No

Once you've completed the screening tool and determined that the proposal is likely to have a positive or neutral impact on people with protected characteristics, the following can be included in the 'Equality Impact Assessment' part of the report. ***'An equality impact check found that this proposal would have a positive or neutral impact on people with protected characteristics. Therefore, a full assessment is not required.'***

Please send this completed EIA Screening Tool to Policy@rushmoor.gov.uk for quality checking by the policy team.

If required, please continue to the full assessment below.