Equality Impact Assessment

Version	1.0	Date Completed	November 2025

Description of what is being impact assessed

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The proposal under review is the submission of the **4-5-1 model** for Local Government Reorganisation (LGR) in Devon, in response to an invitation from the Secretary of State for Housing, Communities and Local Government. This model is designed to create a single tier of local government, consisting of three unitary authorities:

1. **Torbay and Southern Devon Unitary -** comprising South Hams, Teignbridge, West Devon, and Torbay.

2. **Exeter and Northern Devon Unitary -** Comprising North Devon, Torridge, Mid Devon, East Devon, and Exeter.

3. **Plymouth City Council on its current boundaries** – there is also an option to expand the boundary to accommodate parts of four adjacent parishes that fall within the Plymouth Policy Area

The new councils will be responsible for delivering all local government services (social care, education, housing, planning, waste, etc.) across the former Devon County Council footprint. The aim is to unlock Devon's full potential, transform local government, address long-standing challenges, and deliver a simpler, stronger, and more sustainable system that provides better outcomes for residents. The final reorganisation will have a significant impact on service delivery.

Evidence

What data/information have you used to assess how this policy/service might impact on protected groups?

The assessment is based on a rigorous, evidence-led process, combining quantitative analysis, qualitative assessment, and extensive engagement.
- **LGR Proposal Documents:** The **full Proposal for the 4-5-1 model** 'Reimagining Devon: Believe in Better' and the accompanying **Executive Summary** detailing the case for change, options appraisal, and final recommendation for the 4-5-

1+ option. The proposal's core arguments for improved efficiency, capacity, and high-quality, sustainable public services (Criteria 2 & 3). Its commitment to working together to understand and meet local needs (Criteria 4) and stronger community engagement (Criteria 6).

- **Public Engagement Data:** Nearly **6,000 responses** were received through public surveys, targeted workshops, forums, and meetings with stakeholders.

- **Stakeholder Engagement:** Engagement included local housing providers, landlords, and representatives from organisations such as the Citizens Advice Bureau (CAB), which assist vulnerable groups. Outreach was conducted to organisations such as **VSCE** groups, which often represent and advocate for communities with protected characteristics.

- **Socio-economic/Geographic Data:**

  - Levels of **homelessness and fuel poverty** in Devon are higher than similar local authorities.

  - Data shows **deprivation is higher in the north and in rural areas**.

  - The current system struggles with access to services, transport, and digital connectivity in **rural areas**.

- **Demographic/Service User Data:**

  - **Devon-specific demographic data:** High proportion of older people compared to the national average, significant areas of rurality/isolation, and known challenges in delivering complex services like SEND and accessible transport across a large, two-tier system. More women than men are in receipt of adult social care.

Alongside this, the Equality Impact Assessment produced by Devon County Council has also been considered. This document provided a baseline assessment of an alternative LGR proposal (9-1-1 model) but contains relevant Devon-wide data and insights into the general impact of unitarisation on protected groups.

Who have you consulted with to assess possible impact on protected groups and what have they told you? If you have not consulted other people, please explain why?

Extensive consultation included local people, partners, businesses, community groups, voluntary sector partners, and statutory providers. Further targeted consultation with protected characteristic groups is planned for the implementation phase.

Area of Feedback	Protected Group/Vulnerability	Summary of Findings
Accessibility/identity	Age (Older People)	Many residents called for better communication and more accessible local offices for face-to-face interactions, especially for older people. Residents expressed a strong emotional and cultural connection to their local areas, emphasising the importance of preserving distinct community identities. Many expressed fears that being absorbed into larger authorities would lead to a loss of the rural and coastal character of towns and villages.
Youth Support	Age (Young People)	There is a need to support young people, who face issues with a lack of affordable housing, public transport, limited job opportunities, and insufficient youth services.
Accountability	All Groups/Communities	There is strong support for simpler and more accountable local government, joined-up services, and decision-making that remains close to communities. There was widespread concern that larger, centralised councils would be disconnected from local needs and diminish local representation.

Governance	All Groups/Communities	Respondents overwhelmingly supported governance models that enable decisions to be made locally, with councillors and services accessible within their communities.

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. The Council also has a legal duty to have due regard to armed forces personnel when carrying out healthcare, housing and education functions. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, assess the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	• Proposal aims to deliver better outcomes and improve services, particularly social care (high demand). New Unitaries are designed to tackle underperformance for **young people** and address **rural isolation** which affects older people. Therefore significant **opportunity** for better outcomes, particularly for **older people** and **children/young people**, through the integration of Children's Services, Education, and Adult Social Care into single unitaries, enabling more effective early intervention and integrated service planning. **Risk** of service disruption and complex navigation during transition.	☒	☐	☒

Protected characteristic	Impact	Red	Amber	Green
Disability	• **Opportunity** for simplified governance and an integrated service delivery model, which can improve clarity and accessibility. Unitary integration and resilience is designed to deliver **high-quality public services**. Integrated planning (e.g., housing, mental health, SEND) can lead to better outcomes. **Risk** of service realignment as part of the establishing the two unitaries causing complexity in accessing specialist services or inequities in provision if not mitigated.	⊠	☐	⊠
Gender reassignment	• The reorganisation is largely **neutral** in its structural impact, but provides an **opportunity** to embed modern, updated Equality, Diversity, and Inclusion (EDI) policies and culturally competent service design from the formation of the new councils.	☐	⊠	☐
Marriage and civil partnership	• **Neutral** impact on service delivery and policy, as the changes are related to local government structure and functions.	☐	⊠	☐
Pregnancy and maternity	• **Neutral** impact on core policies, but the **opportunity** exists to integrate services (e.g., public health, housing) to better support maternal and infant health outcomes.	☐	⊠	☐
Race and ethnicity	• **Opportunity** to improve EDI data and outcomes tracking across the new, larger geography. The transition is a chance to design services that are more responsive and culturally competent. **Risk** of inequitable access and outcomes disproportionately affecting existing disadvantaged ethnic groups if not monitored.	☐	⊠	⊠
Religion or belief	• **Neutral** impact, as LGR is structural and not directly related to policies affecting religious groups.	☐	☐	⊠

Sex	• **Opportunity** for service reform to better address sex-based inequalities. **Risk** that the workforce reorganisation and efficiency savings could disproportionately affect the local government workforce, which is majority-female, particularly in social care and administrative roles.	☒	☐	☒
Sexual orientation	• **Neutral** impact structurally, with an **opportunity** to embed new EDI policies and ensure an inclusive workplace and service design.	☐	☒	☐
Armed Forces (including serving personnel, families and veterans)	• Legal duty to have due regard. **Positive** potential from simplified, integrated housing, education, and health services through a unitary structure, making support easier to access.	☐	☐	☒
Other, e.g. carers, care leavers, low income, rurality/isolation, etc.	• **Carers/Care Leavers:** High **Positive** potential from integrated social care and health services. **Low Income/Deprivation: Risk** of service inequities and complex navigation. **Opportunity** to direct funding to areas of greatest need, supported by the improved financial resilience of larger unitaries. **Rurality/Isolation: Risk** of loss of local connection. **Mitigation/Positive** The focus on local needs (Criteria 4) should ensure diverse communities continue to be served appropriately with neighbourhood empowerment to bring services closer to residents.	☐	☐	☐

Negative outcomes action plan
Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
Develop a transition plan to ensure **continuity of services** and mitigate the risk of failures during the changeover period. Establish a robust service continuity plan for Adult Social Care and Children's Services (especially SEND) to ensure seamless delivery and communication during the statutory transition period.	July 2026	Chief Executives/ Statutory officers/ LGR Implementation Leads	Weekly transition board reports, monitoring service complaints and critical incident logs.	☐
Conduct **targeted EIAs** for the design and location of critical **frontline services** (e.g., Adult Social Care access points) during implementation to ensure geographic and physical accessibility for those with **disabilities** and in **rural areas**.	TBC	Service Directors / Transition Lead	Accessibility audits; user testing with representative community groups; monitoring of service access rates.	☐
Develop a **Workforce Transition Plan** with formal consultation to ensure fair treatment, clear communication, and support for all staff, specifically mitigating the potential impact on female employees (sex) and older workers (age).	TBC (Post-Decision/ Shadow Authority formation)	Chief Executives/ Statutory officers/ LGR Implementation Leads	Monitoring of redundancy, transfer, and re-employment data across	☐

			protected characteristics.	
Implement the **neighbourhood empowerment** model to ensure decisions and access points are maintained or enhanced at the local level, mitigating the risk of **rural isolation** and loss of accountability for all groups.	TBC	Chief Executives/ Statutory officers/ LGR Implementation Leads	Metrics on Town/Parish Council engagement; uptake of services; resident satisfaction surveys.	☐
Map existing and new service delivery points to ensure the new unitary council footprints maintain an appropriate number of **accessible local offices** for face-to-face service access, prioritising areas with high numbers of older residents.	TBC	Chief Executives/ Statutory officers/ LGR Implementation Leads	Public consultation on new office locations; Monitoring of local access complaints.	☐
Establish **clear, multi-channel service navigation** guidance from Day 1 to prevent short-term confusion and complex access for **older residents** (age), **disabled people**, and those on **low income**.	TBC – pre vesting day	Communications / Digital Leads	Public information campaigns; monitoring of call centre data for confusion points; user feedback.	☐
If negative impacts remain, please provide an explanation below.				

Remaining negative impacts are primarily **unavoidable transition risk** inherent in any LGR process. Despite mitigation, some short-term disruption and initial complexity in service access are likely as systems and cultures merge across the two new Unitaries. The actions listed above are designed to mitigate the impact of this disruption on vulnerable users and staff, but the inherent risk of disruption during a major reorganisation cannot be fully eliminated. This risk is accepted as a short-term cost for the proposed long-term benefits of more integrated, sustainable, and financially resilient local government, which is expected to advance equality over the long term.