

## **APPENDIX B**



### **Equality Impact Assessment: *Local Government Reorganisation in Devon - Final Draft Proposal***

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

<b>Committee name and date:</b>	<b>Report Title</b>	<b>Decisions being recommended:</b>	<b>People with protected characteristics potentially impacted by the decisions to be made:</b>
Special Council 25 November 2025  Executive 26 November 2025	Local Government Reorganisation in Devon: Boundary Proposal from Exeter City Council	<b>Council:</b> 2.1 That Council endorses the Final Proposal for Local Government Reorganisation (LGR) in Devon prior to consideration by Executive on 26 November 2025.	The report sets out a proposal for a single-tier of governance in Devon which will be submitted to Ministry for Housing, Communities and Local Government (MHCLG) by 28 <sup>th</sup> November 2025.  It sets out a proposal to create four new unitary authorities to

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		<p><b>Executive:</b></p> <p>2.1 That Executive agrees the Final Proposal for Local Government Reorganisation (LGR) in Devon.</p> <p>2.2 That Members support the creation of four proposed new unitary councils, the geographic details of which are outlined in the report:</p> <ul style="list-style-type: none"><li>i) a Unitary council for Exeter and surrounding parishes</li><li>ii) a Unitary council for Plymouth and adjacent parishes</li><li>iii) a Unitary council for Torbay and adjacent parishes</li><li>iv) a Unitary council for the Devon Coast and Countryside.</li></ul> <p>2.3 Delegate authority to the Chief Executive to make any further minor amendments to the LGR proposal, in consultation with the Leader, before it is submitted to Government by 28 November 2025.</p>	<p>administer and deliver services across Devon.</p> <p>All residents in Devon will be affected although for most, this will largely be an administrative change. Consideration towards the impacts on people with protected characteristics is detailed below.</p>

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**Factors to consider in the assessment:** For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** – some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers; asylum seekers).	<b>Positive</b>	<b>Low</b>	<p>What does the data tell us:</p> <ul style="list-style-type: none"><li>• <b>LGR Survey 2025:</b><ul style="list-style-type: none"><li>○ White British: 91%, White Other: 3%, Asian/Asian British: 2%, Black/Black British: 0%, Mixed: 1%, Other: 1%.</li><li>○ Community cohesion: 71% agree people from different ethnic backgrounds get on well together.</li><li>○ Barriers: Gypsies and Travellers may find it harder to engage; language barriers for non-native English speakers.</li></ul></li><li>• <b>Exeter Resident Survey 2025:</b><ul style="list-style-type: none"><li>○ White British: 88%, White Other: 3%, Asian/Asian British: 4%, Black/Black British: 1%, Mixed: 1%, Other: 1%.</li></ul></li></ul>

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Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<ul style="list-style-type: none"> <li>○ 81% agree their area is a place where people from different ethnic backgrounds get on well together.</li> <li>○ Other ethnic groups more positive about the council and local area, more likely to feel safe after dark (72% vs. 60% White).</li> </ul> <p>Use Translation and Interpretation Policy for accessible information</p> <p>Gypsies and Travellers are likely to find it more difficult to engage in the consultation and transition process. May not have information about how the authorities are changing and how they receive services.</p> <p>The creation of the new council may allow more space to create stopping places.</p>
<p><b>Disability:</b> as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.</p>	<p><b>Positive</b></p>	<p><b>Medium</b></p>	<p>What does the data tell us:</p> <ul style="list-style-type: none"> <li>• <b>LGR Survey 2025:</b> <ul style="list-style-type: none"> <li>○ 28% report a long-term physical or mental health condition.</li> <li>○ Disabled respondents value support with housing, council tax, benefits, and accessible councillors more highly (mean 4.29–4.46/5).</li> <li>○ Disabled respondents rate supportive councillors, recycling, health, and benefits as more important.</li> </ul> </li> <li>• <b>Exeter Resident Survey 2025:</b></li> </ul>

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<b>Protected characteristic/ area of interest</b>	<b>Positive or Negative Impact</b>	<b>High, Medium or Low Impact</b>	<b>Reason</b>
			<ul style="list-style-type: none"> <li>○ 26% report a long-term condition.</li> <li>○ Disabled residents less satisfied with street cleaning (41% vs. 51% non-disabled), parks (68% vs. 76%), and social housing (38% vs. 40%).</li> <li>○ Disabled residents more likely to feel unsafe after dark (49% feel safe vs. 65% non-disabled) and during the day (84% vs. 93%).</li> <li>○ Disabled residents more likely to disagree that the council provides value for money (34% vs. 28% non-disabled) and more dissatisfied with their local area (15% vs. 9%).</li> </ul> <p>No negative impacts identified at this stage.</p> <p>The proposal includes robust transition planning and a roadmap to ensure all new unitary councils will be safe and legal from day one; able to seamlessly transition the delivery of critical services. Further work will continue at pace during the transition and implementation phase including ongoing engagement with service users.</p> <p>Public Service Reforms and reduced inequalities are key outcomes for Local Government Reorganisation and proposals include how services might be transformed to be more accessible and closer to local providers. Our proposals around Neighbourhood Area Committees would ensure that disabled people are able to continue to access their local councillor.</p>
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual).	<b>Positive</b>	<b>Low</b>	No negative impacts identified at this stage.

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			New local governance structures and strengthened engagement will mean residents are better informed about and have more influence over local decision-making and inclusive service design.
<b>Age</b> (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	<b>Positive</b>	<b>Medium</b>	<p>What does the data tell us:</p> <ul style="list-style-type: none"> <li>• <b>LGR Survey 2025 (Representative sample, n=1,100):</b> <ul style="list-style-type: none"> <li>○ 16–24: 23%</li> <li>○ 25–44: 31%</li> <li>○ 45–64: 26%</li> <li>○ 65+: 19%</li> </ul> </li> <li>• <b>Residents Survey 2025</b> <ul style="list-style-type: none"> <li>○ 16–24: 26%</li> <li>○ 25–44: 30%</li> <li>○ 45–64: 25%</li> <li>○ 65+: 19%</li> </ul> </li> </ul> <p>No negative impacts identified at this stage.</p> <p>The proposal includes robust transition planning and a roadmap to ensure all new unitary councils will be safe and legal from day one; able to seamlessly transition the delivery of critical services. Further work will continue at pace during the transition and implementation phase including ongoing engagement with service users. Public Service Reforms and reduced inequalities are key outcomes for Local Government Reorganisation and proposals include how services</p>

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			<p>might be transformed to be more accessible and closer to local providers.</p> <p>Older residents and young children may be positively impacted by service improvements in respect of Adult Social Care, Children's Services and SEND. This is because services will be within closer proximity and more tailored towards individuals' needs.</p>
<b>Pregnancy and maternity</b> including new and breast-feeding mothers	<b>Positive</b>	<b>Medium</b>	<p>No negative impacts identified at this stage.</p> <p>Young children may be positively impacted by service improvements in Children's Services and SEND.</p>
<b>Gender reassignment</b>	<b>Positive</b>	<b>Low</b>	<p>What does the data tell us:</p> <ul style="list-style-type: none"> <li>○ 1% reported a gender identity different from sex registered at birth.</li> </ul> <ul style="list-style-type: none"> <li>• <b>Exeter Residents Survey 2025:</b> <ul style="list-style-type: none"> <li>○ 1% reported a gender identity different from sex registered at birth.</li> </ul> </li> </ul> <p>No negative impacts identified at this stage. Ensure engagement and service design processes are inclusive of trans and non-binary residents.</p> <p>New local governance structures and strengthened engagement will mean residents are better informed about and have more influence over local decision-making and inclusive service design.</p>
<b>Religion and belief</b> (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	<b>Positive</b>	<b>Low</b>	<p>No negative impacts identified at this stage.</p>

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			New local governance structures and strengthened engagement will mean residents are better informed about and have more influence over local decision-making and inclusive service design.
<b>Marriage and civil partnership status</b>	<b>Positive</b>	<b>Low</b>	No negative impacts identified at this stage.  New local governance structures and strengthened engagement will mean residents are better informed about and have more influence over local decision-making and inclusive service design.

### **Actions identified that will mitigate any negative impacts and/or promote inclusion**

- The council will continue to develop the community building work already taking place through partnership working such as Wellbeing Exeter, which has specific initiatives aimed at engaging groups with protected characteristics.
- A co-designed system of Local Neighbourhood Area Committees (or similar structures) will be created to further strengthen local engagement and provide genuine opportunity for neighbourhood empowerment across all communities.
- Ensure communication, engagement and service design processes are inclusive of and able to reach gypsies and travellers, trans and non-binary residents, disabled people and people for whom English is not their first language.

**Officer: Lorraine Betts**

**Date: 12.11.25**