Equality Impact Assessment

Introduction

An Equality Impact Assessment (EqIA) is a tool to help local authorities ensure their policies, and the ways they carry out their functions, do what they are intended to do and for everybody.

The Equality Act 2010 includes a Public Sector Equality Duty (PSED) which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

The council also considers specific protected groups to ensure they are reflected in strategic decision-making. These include:

Armed forces personnel and Veterans	Carers	Care leavers
Socio-economically disadvantaged	Rural communities	

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made, e.g. at committee or council meetings.

Examples of when an EqIA should be completed are:

• Any proposals to introduce or add to a service	• Any proposals to adopt policy priorities, legislation, strategies and plans
• Any proposals to remove, reduce or alter a service	• Changes to staffing structure where groups of employees are likely to be negatively affected
• Any new policies or changes to policies	• Any proposals in relation to procured or commissioned services

The EqIA consists of two key stages. Stage one is an initial equality screening, which must be reviewed by the Corporate Policy & Governance Team. This review determines whether the second stage, a full equality impact assessment, is required.

Stage 1 - Equality Screening

Whenever a policy/service/function is reviewed, changed, developed or removed, an initial equality screening will need to be undertaken. This will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy, strategy, and project development. You must circulate a copy of the equality screening to policy@stroud.gov.uk where they will determine whether a stage two assessment will need to be completed.

If it is determined that a stage two does not need to be completed, you must circulate the screening to your head of service where they will sign if off and you can then forward the signed-off copy to policy@stroud.gov.uk for their records.

Stage 2 – Equality Impact Assessment

If it is determined that a stage two is required, the full EqIA seeks to identify the impact on people with protected characteristics or protected groups that have been considered, including any mitigating actions proposed, and ensures decisions are based on evidence.

The EqIA should then be circulated to policy@stroud.gov.uk for feedback and then agreed and signed off with the appropriate Head of Service or Director and should be included as an appendix to your covering report for committee or Council, along with commentary on the assessment in the main body of the committee or Council report.

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person(s) responsible for this EqIA	
Officer responsible: Liz Shellam	Service area: Customer Contact Centre
Job title: Community Access & Engagement Manager	Date of assessment: 21/04/2026
Signature: Liz Shellam	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Unacceptable customer behaviour policy	
Is this new or existing?	**Already exists and is being reviewed**
Please specify reason for change or development of policy, function, strategy, service change or project	
Key frontline services highlighted they were experiencing an increase in unacceptable customer behaviour especially verbal aggression over the phone and in person.	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	Ensure fair and consistent approach across all Council services. Enable the Council to respond effectively to unacceptable behaviour. Clarify roles and responsibilities in managing unacceptable behaviour.
Objectives:	Promote awareness of the correct processes for identifying and addressing unacceptable behaviour, helping to reduce incidents. Introduce a incident reporting system to ensure corporate oversight and robust reporting.

Outcomes:	All incidents are logged consistently across service areas Evidence, correspondence and case history are stored in one place Multiple incidents involving the same individual/s can be identified early Managers and the Community Access & Engagement Manager have consistent oversight.
Benefits:	Staff feel supported and wellbeing prioritised. Reduction in incidents

e. What are the expected impacts?

Are there any aspects, including how this piece of work is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Mostly Neutral**

Please provide an explanation for your answer:
Ensure that you include any significant positive or negative impacts to any protected characteristics or protected groups where relevant. This will help us identify whether you need to complete a stage two assessment.

When assessing the impact of the application of this policy on each of the protected characteristics, it has been identified that some people may experience a negative impact if a managed contact approach was implemented. This has been mitigated by key actions and that the policy will be applied recognising that each individual and their circumstances is unique and will be assessed on its own merits with due corporate oversight and governance.

a. Head of Service/Director sign off for stage one assessment

Name: Hannah Emery

Job title: Head of Policy, Governance & Engagement	Date: 12/06/2026

Signature:

Please forward this completed form to the Policy and Governance team via policy@stroud.gov.uk and they will assess whether a stage two is required.

Policy and Governance Review

b. Identify next steps as appropriate	
Stage two required	**Yes**
Reasoning	**This is a corporate policy that impacts how all front-line staff respond to unacceptable behaviour.**
Name	**Emma Smith**
Job title	**Projects and Consultation Officer**
Date of review	**8 June 2026**

Officers do **not need** to complete this section if the Policy and Governance Team have determined that a stage two is not required. If you have been instructed to complete a stage two, please continue to do so in the following section.

STAGE 2 – Full Equality Impact Assessment

1. Engagement and consultation

The best approach to find out if a policy, project or other piece of work, is likely to impact positively or negatively on people with protected characteristics and protected groups is to look at existing research, previous consultation findings and recommendations, or to consult with representatives of those people with protected characteristics and protected groups.

1. Research and evidence
List below any data, consultations (previous, relevant, or future planned), complaints or feedback findings, or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality. *Please visit the* Stroud District Data *webpage on the Hub for support and guidance in accessing data and insights.*
Equalities factsheet 2026
LGA report – Debate not hate
A&S Committee\Verbal Aggression incident report.docx

2. Consultation	
Please visit the Consultation and Engagement Hub for support and guidance on delivering consultations and engagement activities to support the development of work at the council.	
Will any consultation be conducted?	**Yes**

- Describe the consultation or engagement you have conducted or are intending to conduct.
- Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

Consultation completed with key service leads for:

- Staff – completed VAF form and provided feedback/ details of UCB
- Safeguarding Designated Officer – provided advice and comment on draft
- Corporate Health & Safety – process mapping, provided advice and comment on draft
- Environmental Health, Tenant Services, Housing Advice, Customer Contact and Community Services – provided key insight, experience and identified improvement to policy and process to ensure it was robust and practical.
- Information and Governance -
- EDIEB working group – comment, feedback and on draft.
- LMT/ SLT/ ALT - comment, feedback and on draft
- Group Leaders - comment, feedback and on draft

3. Assessment

Assessment of impacts

For each protected characteristic or protected group, please indicate the type of impact:

- Positive – contributes to promoting equality or improving relations between people with protected characteristics and protected groups
- Neutral – no impact
- Negative – could disadvantage them.

Please use the ‘Description of impact’ box to explain how the impact is justified and include any data and evidence that you have collected from surveys, data, complaints or feedback to support your proposed changes

Protected characteristic or group	Specific characteristic (if applicable)	Impact	Description of impact	Mitigating action (if negatively impacted)
AGE	Older people (60+)	Low negative	Older people may communicate differently, have trouble using digital channels, or display frustration linked to access barriers or stress. There is a risk that persistence or repeated contact could be interpretated as unreasonable behaviour without appropriate context.	• Contact management decisions will be proportionate and considerate of differing communication styles or access needs linked to age. • Staff will offer support with understanding processes and accessing services, particularly where digital exclusion is identified.
	Younger people (16-25)	Low negative	Younger adults may communicate differently, have trouble using digital channels, or display frustration linked to access barriers or stress. There is a risk that persistence or repeated contact could be interpretated as unreasonable behaviour without appropriate context.	
	Children (0-16)	Neutral		
	Other	Choose an item.		
DISABILITY A definition of disability under the Equality Act 2010 is available here.	Physical disability	Low negative	People with physical disabilities may experience issues with access to transport and may rely of specific contact channels to access services	• Reasonable adjustments under the Equality Act 2010 will be identified and applied, including alternative communication formats, use of advocates, adjusted contact methods, and flexible approaches to communication. • All staff receive equality and diversity training, and managers are supported to
	Sensory impairment (sight, hearing)	Low negative	People with sensory impairment may experience issues with access to transport and may rely of specific contact channels to access services	

				identify when reasonable adjustments may be required.
	Mental health	Medium negative	Some disabilities (including mental health conditions, learning disabilities, neurodiversity, brain injury, or sensory impairment) can affect communication style, emotional regulation, understanding of processes, or frequency of contact. These behaviours could be misinterpreted as unreasonable or aggressive if not appropriately recognised	• Behaviour will always be assessed in context, with consideration given to whether actions may be linked to disability, mental health, distress, or communication needs. • Reasonable adjustments under the Equality Act 2010 will be identified and applied, including alternative communication formats, use of advocates, adjusted contact methods, and flexible approaches to communication. • All staff receive equality and diversity training, and managers are supported to identify when reasonable adjustments may be required.
	Learning disability	Medium negative		
GENDER REASSIGNMENT	How would this affect people whose gender is different from that assigned at birth?	Neutral	The policy applies equally to all customers. Discriminatory language, including transphobic abuse, is explicitly identified as unacceptable behaviour and managed appropriately.	
MARRIAGE & CIVIL PARTNERSHIP		Neutral	This characteristic is not relevant beyond the duty to eliminate harassment and discrimination.	

PREGNANCY & MATERNITY		Neutral	No specific differential impact identified. Any distress-driven behaviour would be managed proportionately and on an individual basis.	
RACE* Further information on the breakdown below each of these headings, is available here. For example, Asian, includes Chinese, Pakistani and Indian etc.	White	Neutral	Discriminatory or racist behaviour is clearly defined as unacceptable. Reasonable adjustments, inclusive communication, and interpretation of behaviour in context reduce risk of indirect discrimination.	
	Mixed or multiple ethnicities	Neutral		
	Asian or Asian British	Neutral		
	Black, Black British, Caribbean or African	Neutral		
	Other ethnicities (please specify)	Neutral		
RELIGION & BELIEF** A list of religions used in the Census is available here	See note	Neutral	No differential impact identified. Harassment or discrimination based on religion or belief is addressed within unacceptable behaviour definitions.	
SEX	Men	Neutral	The policy is applied consistently regardless of sex. Gender-based abuse is classed as unacceptable behaviour	
	Women	Neutral		
SEXUAL ORIENTATION	Straight/Heterosexual	Neutral		
	Lesbian	Neutral	Homophobic abuse is explicitly identified as unacceptable behaviour	
	Gay	Neutral		
	Bisexual	Neutral		
	Other sexual orientation (please specify)	Neutral		

Other protected groups for consideration				
Socio-economically disadvantaged The term socio-economic refers to the differences between groups of people caused mainly by their financial situation. These include factors like employment, education, health, income, living environment, crime, and access to housing.		Low negative	Customers classed as socio-economically disadvantaged may have limited transport, be digitally excluded, experience reduced broadband access or have additional literacy needs.	• Where managed contact arrangements are applied, alternative reasonable methods of access will be considered to ensure customers can continue to engage with services. • Contact arrangements will be flexible to avoid unintentionally excluding customers with limited transport or digital access.
Rural communities Considerations include how people who live in rural parts of the district can access council services, transport, education, employment, and internet and broadband.		Low negative	Customers living in rural areas may have limited transport, be digitally excluded, or experience reduced broadband access. Restrictions on contact methods (e.g. limiting face-to-face or telephone contact) could disproportionately affect access if alternatives are not considered carefully	• Where managed contact arrangements are applied, alternative reasonable methods of access will be considered to ensure customers can continue to engage with services. • Contact arrangements will be flexible to avoid unintentionally excluding customers with limited transport or digital access.
Carers A carer is anyone, including children and adults, who looks after a family member, partner or friend who needs help because of their illness, frailty, disability, a mental health problem or an addiction and cannot cope without their support. The care they give is unpaid.[1] Please see guidance for considering care experience in EqIAs here.		Low negative	Caring responsibilities may increase stress and limit availability, affect communication and potentially leading to behaviour being misinterpreted.	• Consider individual circumstances when assessing behaviour
Care Leavers A care leaver is defined in law as someone over the age of 16 who has been in the care of the local authority and/or Health and Social Care Trust for a period of at least 13 weeks or more. Please see guidance for considering care experience in EqIAs here.		Low negative	Past trauma or lack of support may affect communication and emotional responses, which could be misinterpreted without context.	• Apply a trauma informed, supportive approach

[1] NHS commissioning » Who is considered a carer?

Other protected groups if applicable (e.g. refugees or asylum seekers, homeless people)		Choose an item.		

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually if relevant and required when considering positive or negative impacts. A list of religions in the Census is available here

Policy and Governance Review

a. Stage two sign-off	
Stage two review completed	**Yes**
Any further changes of feedback	**Further comments have been added throughout for suggested improvements.**
Name	**Emma Smith**
Job title	**Projects and Consultation Officer**
Date of stage two review	**8 June 2026**

a. Head of Service/Director sign off for stage two assessment	
Name: Hannah Emery	
Job title: Head of Policy, Governance & Engagement	Date: 12/06/2026
Signature:	

2. Outcomes, action and public reporting

a. Please list the actions that have been identified through the above impact assessment:

Action	Target completion date	Lead Officer
Contact management decisions will be proportionate and considerate of differing communication styles or access needs linked to age.	**Ongoing**	**Service Manager/ Community Access & Engagement Manager**
Staff will offer support with understanding processes and accessing services, particularly where digital exclusion is identified.	**Ongoing**	**Service Manager/ Community Access & Engagement Manager**
Reasonable adjustments under the Equality Act 2010 will be identified and applied, including alternative communication formats, use of advocates, adjusted contact methods, and flexible approaches to communication.	**Ongoing**	**Service Manager/ Community Access & Engagement Manager**
All staff receive equality and diversity training, and managers are supported to identify when reasonable adjustments may be required.	**Ongoing**	**HR/ Service Manager**

b. Public reporting

All completed EqIAs are required to be publicly available on the Council's website once they have been signed off. EqIAs are also published with the papers for committee and full Council decisions.

3. Monitoring outcomes, evaluation and review

An Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the EqIA for their area, however the Policy and Governance team are available to provide support and guidance. Please email policy@stroud.gov.uk if you have any questions.

4. Document control information (if applicable)

Name	Date	Version	Change