



## Appendix 2 Equality Impact Assessment

|                                                                     |                                                |
|---------------------------------------------------------------------|------------------------------------------------|
| Title of Service, Policy, Procedure, Spending Review being Proposed | Local Government Reorganisation (LGR) Proposal |
| Name of Service Area                                                | Chief Executive and Monitoring Officer         |
| Name of Officer completing this assessment                          | Claire Felton                                  |
| Date Assessment Started                                             | September Council date                         |
| Name of Decision Maker (in relation to the change)                  | Central Government                             |
| Date Decision Made                                                  | Spring/Summer 2026                             |

### Please ensure the following:

- That the document is understandable to a reader who has not read any other documents and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people

## Overview

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

Announced in the English Devolution White Paper (16 December 2024), the former Minister of State for Local Government and English Devolution Minister in the Department for Housing, Communities and Local Government subsequently invited 21 areas (of which Worcestershire was one) to submit a proposal for a transition from the current two-tier structure to that of a unitary single tier local government structure, Local Government Reorganisation (LGR).

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 LGR to create new unitary Councils, simplifying the current 'multi-level' structure of local government in two-tier areas.

Below is an abridged summary of the criteria shared by Government to shape proposals:-

Criteria 1) A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government. Proposals must aim to create a single tier of local government across the area, based on sensible geography, economy, and robust evidence.

Criteria 2) Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks. Councils should ideally serve populations of 500,000+ to ensure efficiency, resilience, and financial sustainability, with clear plans for managing costs and addressing financial challenges.

Criteria 3) Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens. New structures must improve public services, avoid fragmentation, and enhance value for money, especially in critical areas like social care and public safety.

Criteria 4) Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views. Local authorities must demonstrate meaningful local engagement, consider cultural identity, and show how local views have shaped the proposal.

Criteria 5) New unitary structures must support devolution arrangements. Proposals should align with or enable devolution, detailing impacts on existing or planned Combined Authorities and ensuring appropriate governance and population ratios.

Criteria 6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. Plans must show how communities will be actively involved and empowered, building on existing engagement structures where relevant.

The report to which this Equality Impact Assessment (EIA) relates covers the response to that statutory invitation which requires full proposals for LGR to be submitted to government by 28 November 2025.

The proposal to be submitted by Bromsgrove District Council aims to replace the current two-tier system with two new unitary councils: North Worcestershire (Bromsgrove, Redditch, Wyre Forest) and South Worcestershire (Malvern Hills, Worcester City, Wychavon). It is designed to improve service delivery, financial sustainability, and local accountability. The change is driven by the need to address systemic challenges in service quality, financial pressures, and community engagement.

| Who is the proposal likely to affect? | Yes                                 | No                       |
|---------------------------------------|-------------------------------------|--------------------------|
| All residents                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Specific group(s)                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| All Council employees                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Specific group(s) of employees        | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other – Provide more details below    | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

## Details

Outline who could be affected and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

The specific impacts of LGR are subject to the decision from the Ministry of Housing Communities and Local Government (MHCLG) expected in summer of 2026. Until the decision from Government is finalised in relation to which model of reorganisation will be present in Worcestershire specific impacts will vary. Further details on the direct impacts of LGR will be realised throughout the reorganisation process, particularly as part of the development of the implementation phase, including development of a detailed transition plan. The proposal affects all residents and council employees by restructuring service delivery and governance. Vulnerable groups, such as children, older adults, and those with disabilities, may be impacted by changes in social care, housing, and education services. The proposal aims to improve outcomes through prevention-led, place-based services.

## Evidence and data used to inform your equality impact assessment.

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

### Quantitative Evidence

In the creation of the full proposal a wide suite of data has been used to evidence the document outlining the strategic plan for reorganisation in Worcestershire. This evidence base will be included in the final proposals submitted to Government by 28<sup>th</sup> November 2025. At this stage, the Worcestershire protected characteristics data at a population level has been collated. The direct impact to specific demographics and accessibility considerations will be assessed as models are developed as part of implementation planning for the transition to the new Worcestershire Council. It is considered that the impact on people with protected characteristics will become clearer and will likely vary depending on the protected characteristic concerned, once the model for LGR has been decided and once we have moved to more detailed implementation planning involving specific areas.

### Qualitative Evidence

Thirty-two engagement sessions involving key stakeholders has been undertaken. High level engagement with residents has taken place via a survey called “Shape Worcestershire” with 4,249 responses. At this state in the development of final proposals, respondents were asked generic questions such as what was important to them in terms of LGR and what did they see the challenges being. The impact of the changes on specific groups of people will be considered further, once the Government’s decision on the form of local government for Worcestershire has been confirmed.

- Shape Worcestershire public engagement (4,249 responses)
- Ofsted and CQC reports on SEND and care services
- Demographic data (ONS projections)
- Financial modelling and service demand forecasts
- Local economic and housing data
- Mutual Ventures Options Appraisal considered by Full Council September 2025

We have undertaken extensive and regular engagement and consultation with employees regarding the process through a specifically designed LGR Routes campaign which has produced useful qualitative evidence on employees’ feelings, fears and preferences.

## Engagement and Consultation

What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

The public has been engaged through surveys and focus groups. Staff have been engaged through a range of internal channels. Over 700 staff responded to the staff surveys, sharing their hopes for the process, their concerns and their key issues. The ICT-led social media promotion for the Shape Worcestershire campaign achieved a countywide Facebook reach of 56.7k, with 88.8k views and 269 shares.

Below is a list of external stakeholders/groups that have been directly engaged:-

- Engagement with town/parish councils (supported by CALC) (70% support)
- Strategic partners: NHS, Police, Fire, Voluntary, Community and Social Enterprise (VCSE) Sector
- Feedback incorporated into proposal design

Loss of local representation was a key concern raised by residents in the Shape Worcestershire survey. Larger unitary boundaries risk diluting local voice and visibility and therefore exacerbating the democratic deficit that leads to a more disengaged and fragmented society which is less content. The proposed North & South model mitigates this by aligning with existing economic geographies, cultural ties and joint working arrangements, helping ensure all communities remain represented.

Results of our engagement were clear on the things that residents prioritise: -

Infrastructure planning e.g. roads, schools, health (64%)

- Maintaining or improving local services and council owned facilities e.g. community centres, sports grounds, arts centres, museums, etc (59%)
- Council tax levels (45%)
- Survey data shows that residents believe two unitary councils will better improve services (45%), support local identity (46%) and strengthen community engagement (44%). In contrast, the One-Unitary model is seen as remote, less representative and more likely to dilute local priorities.

<sup>1</sup> [Shaping Worcestershire public engagement campaign and survey 2025](#)

A hybrid model which includes shared services is proposed. The focus of the two unitary LGR proposal is on meeting the needs of all people, especially vulnerable adults and children and young people. Consideration of matters such as safeguarding are recognised as important in-service design ensuring accountability and arrangements for good governance are to be put in place.

Given the early stages of the LGR process, the engagement that has been undertaken is in respect of the whole Worcestershire population with specific impacts on those with protected characteristics to be explored in detailed EIAs for specific workstreams and activities associated with LGR as part of the implementation planning for the transition to the new Worcestershire authority.

## Public Sector Equality Duty

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making. Consider the current service and any proposed changes, thinking about what issues may arise.

| Equality Duty Aims                                                                                                                                                                                                       | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Eliminate unlawful discrimination, harassment and victimisation</b><br>How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic | The proposal includes safeguards for vulnerable groups and maintains safeguarding boards. It aims to reduce barriers by embedding services in communities and improving access.<br>Policy options and implementation planning for the transition period will be developed with this consideration in mind, mitigating any disruption to services.<br>Equality considerations need to be part of any new authority's development from the outset through inclusive service design principles. |
| <b>Advance equality of opportunity between different groups</b><br>How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by             | Tailored services for North and South Worcestershire address local inequalities.<br>Integrated Neighbourhood Teams will support early intervention and improve access to services.<br>The focus on prevention will also be positive in advancing equality of opportunity.<br>Equality considerations need to be part of any new authority's development from the outset through inclusive service design principles.                                                                         |

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| those with specific protected characteristic(s).                                                                                                                                  | Digital innovation will be integrated into service design, providing a “digital by choice” approach that will run alongside other routes to access services.                                                                                                                                                                                                                                                    |
| <b>Foster good relations between different groups</b><br>Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim? | Policy options and implementation planning for the transition period will be developed with this consideration in mind.<br>The proposal strengthens community engagement through Neighbourhood Area Committees and partnerships with town/parish councils and VCSEs.<br>Equality considerations need to be part of any new authority’s development from the outset through inclusive service design principles. |

### Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
  - Does it affect some equality groups or communities differently and can this be justified?
  - Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)

### Impact of proposal

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

### If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

| Protected Group | Impact of proposal                    | Justification for any actual or potential unfairness identified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age             | Mixed (access to services may change) | <p>The aim of LGR is to provide better outcomes alongside more effective and efficient service delivery for all, therefore, to be positively impacting all residents including those with protected characteristics. Detailed transition planning will follow the submission of the final proposal, in which detailed plans will be undertaken for each community of place and identity. These characteristics will be considered within individual EIA assessments for each initiative, therefore considered to be 'impact neutral' at this stage until further detailed plans are made.</p> <p>Ensuring services are accessible both physically and through public transport will also need to be considered as part of the final proposal, as will consideration for any digitally excluded communities.</p> | <ul style="list-style-type: none"> <li>• Maintain continuity of care, tailored strategies</li> <li>• Ensure accessibility in service redesign</li> <li>• Monitor service equity</li> <li>• Inclusive engagement</li> <li>• Monitor workforce impacts</li> <li>• Inclusive service design</li> <li>• Maintain continuity of support</li> <li>• Inclusive policies and training</li> <li>• No change to service access</li> <li>• Utilise key Voluntary and Community Sector partners to engage with specific groups</li> <li>• Maintain interpreting and translation opportunities</li> <li>• Additional support provided as appropriate to employees with a disability</li> <li>• Promotion of employee support services (e.g. EAP)</li> </ul> |

|                                |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|--------------------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Disability                     | Mixed (access to services may change) | <p>Place-based delivery improves responsiveness</p> <p>Ensuring services and information are accessible and that public transport is available will also need to be considered as part of the final proposal.</p> <p>The impact to the mental health of employees has to be prioritised during development and implementation. Relevant support should be provided to employees with a disability during the transition to a new authority.</p> |  |
| Transgender                    | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Marriage and Civil Partnership | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Pregnancy and Maternity        | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Race                           | Neutral                               | No direct targeting- however we must ensure that any language barriers are considered when issuing key communications.                                                                                                                                                                                                                                                                                                                          |  |
| Religion or Belief             | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Sex (Male/ Female)             | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Sexual Orientation             | Neutral                               | No direct targeting                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Health Inequalities            |                                       | Healthy living is a core outcome of LGR, aiming to increase life                                                                                                                                                                                                                                                                                                                                                                                |  |

|  |  |                                                                                                             |  |
|--|--|-------------------------------------------------------------------------------------------------------------|--|
|  |  | expectancy through prevention and joined up approaches to health related services (health and social care). |  |
|--|--|-------------------------------------------------------------------------------------------------------------|--|

#### How will you monitor any changes identified?

At this stage ongoing assessment and analysis is being undertaken as part of the development of the transition/implementation programme, which is scheduled to commence by summer 2026 following a Government decision on the model of reorganisation for Worcestershire.

- Quarterly performance dashboards
- Key lines of reporting through appropriate democratic reporting lines and structures
- Stakeholder feedback loops
- Equality metrics in service reviews
- Ongoing engagement with communities

**The actions required to address these findings are set out below.**

| Action Required                              | By Whom                         | By When                | Completion Date |
|----------------------------------------------|---------------------------------|------------------------|-----------------|
| Develop inclusive service design principles  | Senior leadership               | July 2026 – May 2027   |                 |
| Monitor equality impacts during transition   | Engagement & Equalities Advisor | June 2027 – March 2028 |                 |
| Engage protected groups in service co-design | Policy Manager                  | July 2026 – May 2027   |                 |
|                                              |                                 |                        |                 |

| Sign off on completion             | Name | Signature | Date |
|------------------------------------|------|-----------|------|
| Lead Officer completing assessment |      |           |      |
| Equality Officer                   |      |           |      |

**When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.**