

EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The [‘A More Equal Wales – Mapping Duties’](#) guide highlights the alignment of our duties in respect of the above-mentioned legislation.

SECTION 1 – PROPOSAL DETAILS

Lead Officer: Gareth Pearce

Service Director: Tim Jones

Service Area: ICT & Digital

Date: 8/February 2022

1.a) What are you assessing for impact?

Strategy/Plan	Service Re-Model/Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.b) What is the name of the proposal?

ICT & Digital Strategy 2022-2026

1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

The Digital Strategy 2022-2026 seeks to put in place our vision of being a truly “Digitally Driven Council,” that provides excellent services, which are efficient, effective and designed with the person and modern customer expectations at their heart and delivered by a digitally empowered workforce. This Strategy replaces the previous Digital Strategy 2017.

Our strategy will be delivered through four thematic workstream areas:

- Digital Solutions and Service Design
- Data Insight and Intelligence
- Digital Infrastructure

- Digital Skills, Learning & Inclusion

1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

The Digital Strategy is clearly aligned to our Corporate Plan 2020-24 – Making a Difference that sets out our priorities that will help us to achieve our Council’s vision. “To be the best place in Wales to live, work and play, where people and businesses are independent, healthy, and prosperous.”

This strategy is affected by legislation in particular the Well-being of Future Generations Act that sets out Wales’s ambition for a prosperous, resilient, sustainable, healthier, more equal Wales, with cohesive communities, a vibrant culture and thriving Welsh language, which also provides us strategic direction for the development of digitally enabled services.

Other areas of key legislation are:-

Web Content Accessibility Guidelines 2.1

Welsh Language Measure

Public Sector Network Code of Practice

UK General Data Protection Act

1.e) Please outline who this proposal affects:

- Service users
- Employees
- Wider community

SECTION 2 – SCREENING TEST – IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Age (<i>Specific age groups i.e. young people or older people</i>)	Positive	<p>The Digital Strategy will support people who choose to access services and are then able to participate digitally.</p> <p>Ensuring new digital services are built on user-centred design principles, and that they are developed to be bilingual and fully accessible will help support equality. Digital Work Programme deliverables will consider the impact of equality as part of its acceptance, design and solution process. A Strategic Digital Delivery Board will act as the gatekeeper for digital project approval.</p> <p>If the Council failed to provide non-digital means of engaging with it, that could be to the detriment of those</p>	<p>Local User Research – Addressing Digital Exclusion. Welsh Government - Digital Inclusion Strategic Framework Welsh Government – Digital Inclusion a forward look Older Peoples Commission - Leave no one behind Wales Cooperative - Digital Inclusion, Exemplar Wales NESTA - What is Data Poverty? Council Staff Strategy Consultation National Wales Survey’s Office National Statistics</p> <p>Partner Engagement - Get RCTOnline Digital Communities Wales Centre Digital Public Service</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>people who do not have the skills or capabilities to engage online. The mitigation of this will include the retention/development of assisted digital approaches and, where necessary for those who cannot engage digitally, more traditional channels.</p> <p>We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of the Digital Work Programme to reduce any barriers.</p>	<p>Office of Chief Digital Officer Wales (LocGov) SOCITM Cymru</p> <p>The National Survey for Wales 2021-22 April to June shows that the percentage of people who do not use the internet has dropped from 23% in 2012/13 to 7% 2021/22. However, certain groups are overrepresented in this area, for example, only 36% of people over 75 have basic digital skills, compared with 87% of 16-49 year olds.</p> <p>Local User Research - research identified that the key barriers to becoming digitally included were: Access to an appropriate digital device, Basic Digital Skills and Connectivity. Digital Exclusion in these primary areas is</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
			<p>heightened for an age group of 75+</p> <p>Wider Sources</p> <p>What we mean by digital inclusion - NHS Digital 210513-lloyds-consumer-digital-index-2021-report.pdf (lloydsbank.com)</p> <p>ppp_digital-_inclusion_uk.pdf (ageuk.org.uk)</p>
<p>Disability <i>(people with visible and non-visible disabilities or long-term health conditions)</i></p>	<p>Positive</p>	<p>The Digital Strategy will support people who choose to access services and are then able to participate digitally.</p> <p>Ensuring new digital services are built on user-centred design principles, and that they are developed to be bilingual and fully accessible will help support equality. Digital Work Programme deliverables will consider the impact of equality as part of its acceptance, design and solution process. A Strategic Digital Delivery Board will act as the</p>	<p>Local User Research – Addressing Digital Exclusion. Welsh Government - Digital Inclusion Strategic Framework</p> <p>Welsh Government – Digital Inclusion a forward look</p> <p>Older Peoples Commission - Leave no one behind</p> <p>Wales Cooperative - Digital Inclusion, Exemplar Wales</p> <p>NESTA - What is Data Poverty?</p> <p>Council Staff Strategy Consultation</p> <p>National Wales Survey's Office National Statistics</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>gatekeeper for digital project approval.</p> <p>The Councils corporate website provides a high level rating and supporting tools to ensure strong accessibility. Work will continue to improve accessibility.</p> <p>If the Council failed to provide non-digital means of engaging with it, that could be to the detriment of those people who do not have the skills or capabilities to engage online. The mitigation of this will include the retention/development of assisted digital approaches and, where necessary for those who cannot engage digitally, more traditional channels.</p> <p>We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of</p>	<p>Partner Engagement - Get RCTOnline Digital Communities Wales Centre Digital Public Service Office of Chief Digital Officer Wales (LocGov) SOCITM Cymru</p> <p>The Council corporate website accessibility rating is 91% with accessibility tools deployed to further support.</p> <p>The National Survey for Wales showed that 87% of people with a disability or long-term health condition use the internet compared with 93% of those without.</p> <p>Local User Research - research identified that 90% of people with a disability had access to a device and 87% had connectivity (4.6% cited connectivity could be</p>

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		the Digital Work Programme to reduce any barriers.	improved). Key barriers to becoming digitally included were feelings of low confidence and it was complicated. Wider Sources What we mean by digital inclusion - NHS Digital 210513-lloyds-consumer-digital-index-2021-report.pdf (lloydsbank.com) ppp_digital-_inclusion_uk.pdf (ageuk.org.uk)
Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities)</i>	Positive	Our research has not identified any particular impacts for people on the basis of gender reassignment. However we believe that our focus on the ability to remove or accommodate non-forced entry of gender specific information like Title, Birth Names and Birth Gender where possible would have a positive impact.	Local User Research – Addressing Digital Exclusion. Welsh Government - Digital Inclusion Strategic Framework Welsh Government – Digital Inclusion a forward look Older Peoples Commission - Leave no one behind Wales Cooperative - Digital Inclusion, exemplars in Wales NESTA - What is Data Poverty? Council Staff Strategy Consultation

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
			<p>National Wales Survey's Office National Statistics</p> <p>Partner Engagement - Get RCTOnline Digital Communities Wales Centre Digital Public Service Office of Chief Digital Officer Wales (LocGov) SOCITM Cymru</p>
<p>Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i></p>	Neutral	Our research has not identified any particular impacts for people on the basis of marriage or civil partnership.	As Above
<p>Pregnancy and Maternity <i>(women who are pregnant/on maternity leave)</i></p>	Neutral	Our research has not identified any particular impacts impacts for people on the basis of pregnancy and maternity.	As Above
<p>Race <i>(ethnic and racial groups i.e. minority ethnic groups, Gypsy, Roma and Travellers)</i></p>	Positive	Research shows that there maybe disproportionate impacts for ethnic and racial groups. In particular many Gypsies and Travellers experience digital exclusion. Gypsies and	Across the great divide:The impact of digital inequality on Scotland's Gypsy/Traveller children and young people

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		Travellers are less likely to use the internet regularly, less likely to possess digital skills and significantly less likely to have a household internet connection than the majority of the population. We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of the Digital Work Programme to reduce any barriers.	during the COVID-19 emergency Digital Exclusion in Gypsy and Traveller communities in the United Kingdom
Religion or Belief <i>(people with different religions and philosophical beliefs including people with no beliefs)</i>	Neutral	Our research has not identified any particular impacts for people on the basis of religion or belief.	As Above
Sex <i>(women and men, girls and boys)</i>	Neutral	Our research has not identified any particular impacts for people on the basis of sex.	As Above
Sexual Orientation <i>(bisexual, gay, lesbian, straight)</i>	Neutral	Our research has not identified any particular impacts for people on the basis of sexual orientation.	As Above

In addition, due to Council commitments made to the following groups of people we would like you to consider impacts upon them:

	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Armed Forces Community <i>(anyone who is serving, has served, family members and the bereaved)</i>	Positive	During the pandemic we recognised there was a digital divide for some veterans within RCT. Working with the Armed Forces Community, we have supported inclusion by making tablet devices available via a project to allow veterans to get connected, access vital services and keep in touch with each other.	As Above
Carers <i>(anyone of any age who provides unpaid care)</i>	Neutral	Our research has not identified any particular impacts for people on the basis the carers community.	As Above

If the initial screening test has identified negative impacts then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant please provide an adequate explanation below:

Are you happy you have sufficient evidence to justify your decision?

Yes

No

Name: Gareth Pearce

Position: Head of Technology

Date: 25/February/2022

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

PLEASE NOTE – there is a separate impact assessment for Welsh Language. This must also be completed for proposals.

Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a 'strategic nature' is available on page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

- Single parents and vulnerable families
- Pensioners
- Looked after children
- Homeless people
- Students
- Single adult households

- People living in the most deprived areas in Wales
- People with low literacy and numeracy
- People who have experienced the asylum system
- People misusing substances
- People of all ages leaving a care setting
- People involved in the criminal justice system

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Low Income/Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Positive</p>	<p>Digital devices can be expensive and not all are able to access digital as a service.</p> <p>Increasingly, households are having to choose between paying for Wi-Fi/mobile data or other household essentials such as food and fuel.</p> <p>Lower income families and individuals may be affected by access to and affordability of devices and connectivity. Equally as people may not have access to devices and networks, they may also not have developed digital knowledge, motivation or skills.</p> <p>The negative impacts span all aspects of daily life. The greater someone's need for digital services, the greater the impact reduced access has on their life. For example, unemployed job seekers typically have a high need, because they need to go online to search and apply for jobs, but are unable to afford to get online when they are without paid employment.</p>	<p>Local User Research – Addressing Digital Exclusion.</p> <p>Welsh Government - Digital Inclusion Strategic Framework</p> <p>Welsh Government – Digital Inclusion a forward look</p> <p>Older Peoples Commission - Leave no one behind</p> <p>Wales Cooperative - Digital Inclusion, exemplars in Wales</p> <p>NESTA - What is Data Poverty?</p> <p>Council Staff Strategy Consultation</p> <p>National Wales Survey's Office National Statistics</p> <p>What we mean by digital inclusion - NHS Digital</p> <p>Partner Engagement - Get RCTOnline</p> <p>Digital Communities Wales</p> <p>Centre Digital Public Service</p> <p>Office of Chief Digital Officer Wales (LocGov)</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		<p>We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of the Digital Work Programme to reduce any barriers.</p>	<p>SOCITM Cymru</p> <p>The National Survey for Wales showed that those who are economically inactive are less likely to visit a website (71%) than those in employment (82%).</p> <p>National Wales research identified that data poverty is a widespread issue across disadvantaged groups in Wales. It further stated four main barriers that prevent people from accessing enough mobile or broadband data for their needs: lack of money, lack of contracts, shared access, and lack of infrastructure</p> <p>Non-Government Sources 210513-lloyds-consumer-digital-index-2021-report.pdf (lloydsbank.com) 211109-lloyds-essential-digital-skills-report-2021.pdf</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p>Low and / or No Wealth <i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i></p>	<p>Positive</p>	<p>Digital devices can be expensive and not all are able to access digital as a service.</p> <p>Increasingly, households are having to choose between paying for Wi-Fi/mobile data or other household essentials such as food and fuel.</p> <p>Lower income families and individuals may be affected by access to and affordability of devices and connectivity. Equally as people may not have access to devices and networks, they may also not have developed digital knowledge, motivation or skills.</p> <p>The negative impacts span all aspects of daily life. The greater someone's need for digital services, the greater the impact reduced access has on their life. For example, unemployed job seekers typically have a high need, because they need to go online to search and apply for jobs, but are unable to afford to get online when they are without paid employment</p>	<p>As Above</p>

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of the Digital Work Programme to reduce any barriers.	
<u>Material Deprivation</u> <i>(unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)</i>	Positive	<p>Digital devices can be expensive and not all are able to access digital as a service.</p> <p>Increasingly, households are having to choose between paying for Wi-Fi/mobile data or other household essentials such as food and fuel.</p> <p>Lower income families and individuals may be affected by access to and affordability of devices and connectivity. Equally as people may not have access to devices and networks, they may also not have developed digital knowledge, motivation or skills.</p> <p>We will take steps to mitigate negative impact by ensuring initiatives (for example free public access PCs, devices loaning, connectivity and confidence/skills support) form part of</p>	As Above

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
		the Digital Work Programme to reduce any barriers.	

<u>Socio-economic disadvantage</u>	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<p><u>Area Deprivation</u> <i>(where you live (rural areas), where you work (accessibility of public transport))</i></p>	Positive	<p>People living in rural areas who are not online maybe excluded due to problems in broadband provision, both for fixed line and mobile broadband services. There are still areas of Rhondda Cynon Taf affected by not-spots, although the prevalence of these is decreasing.</p> <p>We will take steps to mitigate the negative impact by working with telecome suppliers, Welsh Government and communities to seek opportunities to further decrease not-spots.</p>	<p>Local Broadband information - Rhondda Cynon Taf. https://labs.thinkbroadband.com/local/W06000016</p> <p>Rhondda Cynon Taf current information is that 1.2% of buildings across the County Borough are unable to access a minimum of Superfast Broadband speed (to 30mbps), this in the context of 3.7% gap across Wales.</p>
<p>Socio-economic background <i>(social class i.e. parents education, employment and income)</i></p>	Positive	The Strategy and digital work programme will seek to create opportunities for socio-economic disadvantaged people. jobs and opportunities, but also	

		enable them to participate in activities that may not have been accessible in the past	
Socio-economic disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i>	Positive		

SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. **Attach a separate action plan where impacts are substantial.**
- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.
- 4.c) Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/staff.
- 4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.
- 4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?
Yes No

SECTION 5 – MONITORING AND REVIEW

5a) Please outline below how the implementation of the proposal will be monitored:

To oversee the delivery of this Strategy and its associated Digital Work Programme, a Strategic Digital Delivery Board will be formed. The board will:-

- Provide the leadership and strategic direction to drive forward the Councils' Digital ambitions and priorities.
- Champion digital, technology and data across the Council, ensuring resources are deployed to achieve the maximum outcomes.
- Monitor and challenge progress of the Digital Work Programme to ensure deliverables are met.
- Act as a gateway for the strategic assessment and approval of future requested digital work proposals to ensure compliance with legislation e.g. Welsh Language, UKGDPR, Equality, and their effective prioritisation.
- Oversee and guide the delivery of actions aligned to the strategy.

Review guidance and digital inclusion reporting to support decision making.

The ICT & Digital Service will continue to use data published through the National Survey for Wales, Office for National Statistics (ONS) and Ofcom to monitor levels of Internet Use/Digital Inclusion across Wales and to report against targets set out within the Strategy.

Progress will further be monitored by the Senior Leadership Team, Scrutiny Committee and Cabinet.

5b) When is the evaluation of the proposal due to be reviewed?

The Strategy is due to be reported to Cabinet in March 2022. Once approved/formulised a Digital Work Programme will be developed for delivery.

5c) Who is responsible for the monitoring and review of the proposal?

The ICT & Digital Service Management team reporting to the Strategic Digital Delivery Board.

5d) How will the results of the monitoring be used to develop future proposals?

Each theme within the Strategy will have its own work stream and delivery plan that form the overarching Digital Work Programme. Individual project closure reports will encompass any learning to inform future proposals.

SECTION 6 – REVIEW

As part of the Impact Assessment process all proposals that fall within the definition of ‘Key Decisions’ must be submitted to the Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your proposal is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Decision please forward your impact assessment to Councilbusiness@rctcbc.gov.uk for a Review Panel to be organised to discuss your proposal. The EqlA guidance document provides more information on what a Key Decision is.

It is important to keep a record of this process so that you can demonstrate how you have considered equality and socio-economic outcomes. Please ensure you update the relevant sections below

Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
Consultation Comments	Date Considered	Brief description of any amendments made following consultation

SECTION 6 – SUMMARY OF IMPACTS FOR THE PROPOSAL

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

SECTION 7 – AUTHORISATIONS

Lead Officer: Gareth Pearce

Name: Gareth Pearce

Position: Head of Technology

Date: 18/2/22

I recommend that the proposal:

- Is implemented with no amendments
- Is implemented taking into account the mitigating actions outlined
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage

Head of Service/Director Approval: Tim Jones

Name: Tim Jones

Position: Service Director - ICT & Digital

Date: 18/2/22

Please submit this impact assessment with any SLT/Cabinet Reports.