

Equality Impact Assessment



Assessment Of: Local Government Reorganisation (LGR) Proposal	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service	<input checked="" type="checkbox"/> New
<input checked="" type="checkbox"/> Other:	<input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Place	Assessment carried out by: Tom Pearce
Service Area: Strategy and Partnerships	Job Role: Project Manager
Version / Date of Sign Off by Director:	14/11/2025

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

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

1. **Torbay and Southern Devon Unitary** - comprising South Hams, Teignbridge, West Devon, and Torbay.
2. **Exeter and Northern Devon Unitary** - Comprising North Devon, Torridge, Mid Devon, East Devon, and Exeter.
3. **Plymouth City Council on its current boundaries** – there is also an option to expand the boundary to accommodate parts of four adjacent parishes that fall within the Plymouth Policy Area

The new councils will be responsible for delivering all local government services (social care, education, housing, planning, waste, etc.) across the County of Devon.

The aim is to unlock Devon's full potential, transform local government, address long-standing challenges, and deliver a simpler, stronger, and more sustainable system that provides better outcomes for residents. The final reorganisation will have a significant impact on service delivery.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community	<input checked="" type="checkbox"/> Teignbridge workforce
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1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation for age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Please see: [Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk).

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Protected Characteristic: Age Reference: Subnational population projections for England - Office for National Statistics The median age in Teignbridge is projected to rise from 50 years in 2022 to 51 years in 2032. In England, the median age is projected to be 41 years in 2032. In 2032, 30% of the population in Teignbridge are projected to be aged 65 years or over, up from 26% in 2022. In 2032, 16% of people are projected to be aged 18 years and under, down from 19% in 2022. This is below average for England in 2032 (20%).	This tells us that the ageing population will increase demand for elements of Social Services, and design of a future unitary and financial sustainability forecasting should take this demographic change into account. Engagement activities should use varied consultation methods to ensure all can access (e.g., in-person sessions, paper questionnaires and digital platforms).
Protected Characteristic: Disability	Service design must account for accessibility in housing, transport, healthcare, and digital

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
<p>Reference: Disability in England and Wales, 2021 - Office for National Statistics</p> <p>In Teignbridge 18.6% of residents were classed as living with some form of disability in the 2021 census. The proportion of females was slightly higher at 19.7%, with males at 17.4%</p> <p>This broke down to 11.4% of residents who classed themselves as 'limited a little' and 7.2% of residents who classed themselves as 'limited a lot'.</p>	<p>platforms, ensuring compliance with equality legislation and best practice. For consultation, methods should go beyond standard formats—offering accessible venues, alternative communication channels, and assistive technologies to remove participation barriers. This underscores the importance of embedding inclusivity from the outset.</p>
<p>Protected Characteristic: Sex</p> <p>Reference: Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland - Office for National Statistics</p> <p>In Teignbridge the population is 51.4% female, slightly greater than the UK as a whole at 51%</p>	<p>A district with a slightly larger female population than male may influence both the design of a unitary authority and its consultation process. In terms of governance design, demographic balance can shape priorities around services such as healthcare, childcare, and community safety, which often have gendered impacts. For consultation, ensuring inclusive engagement is critical; methods should account for potential differences in availability, communication preferences, and representation, so that all voices are proportionately heard.</p>
<p>Protected Characteristic: Race</p> <p>Reference: ONS, Census 2021</p> <p>Teignbridge Ethnic Group Classification:</p> <ul style="list-style-type: none"> •97.6% (2021 census) of the district identifies as predominantly white (e.g., English / Welsh / Scottish / Northern Irish / British / Irish or Any other White background). •0.7% of the district identifies as predominantly Asian (e.g., Asian British / Asian Welsh / Bangladeshi / Chinese / Indian / Pakistani or Any other Asian background). •0.1% of the district identifies as predominantly Black (e.g., Black British / Black Welsh / Caribbean / African or other Black). •1.1% of the district identifies as predominantly Mixed of Multiple Ethnic groups (e.g., White and Asian / White and Black African / White and Black Caribbean and Other Mixed or Multiple ethnic groups). •0.3% of the district identifies as predominantly and other ethnic group (e.g., Arab or any other ethnic group). 	<p>This tells us that the district has a predominantly white British population. Compared to the United Kingdom as a whole, Teignbridge has lower proportions of the population who identify as Asian, Black, other or mixed ethnicity. However, this represents thousands of individuals, and we must take care to ensure the voices and needs of minority groups are met.</p>
<p>Protected Characteristic: Religion</p> <p>Ref: Religion - Office for National Statistics</p> <ul style="list-style-type: none"> • In the 2021 census the greatest proportion of respondents declared 'No 	<p>Religion: Policy should be considerate of the needs of all residents and engagement should be designed to encourage participation from all groups.</p>

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
Religion' at 44.8%, followed by 'Christian' at 38.7% and 'No Response' at 4.3%. Buddhist, Hindu, Jewish, Muslim and Sikh together made up 0.6% of the population of Teignbridge.	
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

As Teignbridge currently only provides lower-tier services within our district, we do not hold detailed evidence on the demographics and characteristics of upper tier service users. In our initial consultation we recorded demographic information on the age, sex, ethnicity and if respondents had a disability or long-term health condition. Devon County Council have also completed an Equality Impact Assessment.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure, please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Over the summer we undertook a range of engagement with the local community to gain a better understanding of local needs, aspirations and concerns. We reached out to Teignbridge residents and businesses and undertook more targeted engagement with the voluntary and community sector and harder to reach groups.

Wider stakeholder engagement with key partners and service providers was coordinated more centrally with the other Devon district councils due to several stakeholders crossing district borders.

Engagement included:

- A survey which was formed in partnership with the other district councils to allow for data to be compared. This included a range of multiple choice and open-ended questions. We ran our survey for 9 weeks.
- Held 11 drop-in sessions across the district in July
- Meetings, face-to-face activities and tailored surveys for hard-to-reach groups

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

The next stage consultation will be undertaken by central government: Teignbridge will continue to play a role through promoting the consultation with a focus on ensuring representation from all under-represented groups. This will be achieved through our existing relationships with community and voluntary sector groups, including targeted outreach where appropriate.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Unitary authorities provide both Education and Children's Services, and the effective design and performance of these is vital.
Mitigations:	Best practice will be used in the design of these services and any proposed changes will align with best practice and
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>

Potential impacts:	Unitary authorities deliver both Adult Social Care and related support services, and the delivery of these must be managed to provide the required level of service from the outset of any new authority.
Mitigations:	Ensuring these are well-designed and perform effectively is essential for the wellbeing of older people
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Unitary authorities are responsible for delivering Adult Social Care and associated support services, and ensuring these are effectively designed and perform well is crucial for meeting the needs of people who identify as disabled.
Mitigations:	To prevent adverse impacts, services should be designed and delivered in ways that are accessible, inclusive, and responsive to the needs of older people and those identifying as disabled. This includes clear communication, co-design with affected groups, physical and digital accessibility, staff training, and ongoing monitoring to address issues quickly
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Opportunity for service reform to better address sex-based inequalities.
Mitigations:	Further assessments will be undertaken into any proposed workforce reorganisation or service design to ascertain the impact on this protected characteristic.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Neutral impact structurally, with an opportunity to embed new EDI policies and ensure an inclusive workplace and service design
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Pregnancy/maternity and early years service provision will be delivered by any future unitary authority, and the quality of these services will directly impact this group.
Mitigations:	There is an opportunity to create improvements in the design and performance of these services to better serve the community.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Neutral impact structurally, with an opportunity to embed new EDI policies and ensure an inclusive workplace and service design
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to improve EDI data and outcomes tracking across the new, larger geography. The transition is a chance to design services that are more responsive and culturally competent.
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Neutral impact, as LGR is structural and not directly related to policies affecting religious groups.
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Neutral impact on service delivery and policy, as the changes are related to local government structure and functions.
Mitigations:	

OTHER RELEVANT CHARACTERISTICS

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Individuals and communities from deprived socio-economic groups are more heavily affected by changes in provision of local government services, such as social care and children's services.
Mitigations:	Detailed structural and service design work will be undertaken to ensure any new unitary authority is safe and legal on day one, and all possible opportunities are taken to improve services provided to these individuals and groups.
Other group(s) <i>Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport</i>	Unitary authorities have a strategic transport role, and the creation of a new unitary authority provides opportunities for this to better address the issues faced by rural communities as highlighted by the recent Index of Multiple Deprivation publication 2025.
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The move to a single unitary authority provides opportunities to streamline services for all customers, including those protected groups who are proportionally more likely to use certain services. Service design can be evaluated and revised to better address existing inequalities and improve community cohesion.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

As this proposal is subject to government review and the process of Local Government Reorganisation is subject to further public consultation any impacts, either positive or negative, will be further assessed following governmental decision.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

As this proposal is subject to government review and the process of Local Government Reorganisation is subject to further public consultation any impacts, either positive or negative, will be further assessed following governmental decision. Throughout our work we will embed the Public Sector Equality Duty in the design of any future unitary, and in all engagement and consultation activities which take place

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

Improvement / action required	Responsible Officer	Timescale
Strategy to promote government consultation ensuring broadest possible representation from Teignbridge residents, businesses, community and voluntary sector partners, with particular outreach to our more vulnerable and hard-to-reach communities.	Morgan Wilkinson	TBC (pending launch and format of government consultation)

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective, and your approach is still appropriate. Include the timescale for review in your action plan above.

The final design and implementation of the reorganisations will be carried out by a separate body, so it will be difficult to show a clear link. However, as part of the Council's response to the Government consultation we will engage with our communities and undertake a further assessment of the proposals against this template.

4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?

See section 4.2

Step 5: Review & Sign-Off

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

Reviewed by Service Manager: Yes <input type="checkbox"/> No <input type="checkbox"/> Instead was reviewed by:	Strategic Leadership Team Sign-Off: Neil Blaney
Date:	Date: 14/11/2025