

Equality Impact Assessment (EqIA)

The Equality Act 2010 introduced the Public Sector Equality Duty which states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

This document demonstrates how the Council is meeting the Public Sector Equality Duty by setting out the findings of an equality analysis that has been undertaken in relation to a proposed change to assess whether it has a disproportionate impact on people who share a protected characteristic. The Council's Equality Impact Assessment (EqIA) process covers additional groups not 'protected' by section 149 of the Equality Act 2010, including care leavers and care experienced adults.

1. Background

Directorate	Corporate Resources
Service area	Human Resources
Title of the proposed change being assessed i.e. the policy, service or other development	HR Personal Records and Vendor Invoices - Document Scanning and Storage System

Describe the purpose of the proposed change and the intended outcomes
<p>The aim of the project is to procure and implement electronic scanning and storage facilities for both HR personal records (application forms, references etc.) and supplier invoice images. The main part of the project involves procuring and implementing a new storage system to replace the current Opentext system which only holds HR records and is nearing the end of its useful life. The other main drivers for the project are:</p> <ul style="list-style-type: none"> • The need to be able to manage personal records in line with general data protection regulation (GDPR) requirements • The need to be able to receive invoices in one central point and make images available to staff across the council. This is part of a wider project aiming to improve our control over the speed at which we pay invoices, which has a significant impact on cash management investment returns. <p>The implementation has proved challenging and the overall environment within which the system works has changed with the imminent implementation of a new version of the SAP business system. Consequently, there is a need to extend the</p>

contract with the implementation partner and expand its scope to cover integration with the new SAP system.

It is important to emphasise that this project involves implementing a back-office system which does not have a direct impact on most council frontline service users. However, it covers a wide range of mainly internal service users as well both external customers/suppliers as well as ex-employees making an impact assessment necessary.

Who is affected by the proposals?

Service users:	Yes/No
Wider community:	Yes/No
Workforce:	Yes/No
Other (please specify):	The system holds records for some Gloucester City Council staff. The council provides an HR service to Gloucester City on a contractual basis and records storage forms part of that service.

Decision to be taken and decision maker	<p>That the cabinet member:</p> <ol style="list-style-type: none"> 1. Ratifies a decision taken by the Director – People and Digital Services to exercise the second of the council’s one-year extension options (which commenced on 20th September 2023) under its contract with Softcat Ltd for the supply of implementation support services in respect of the implementation of the Opentext document management system (the first such extension option having been exercised in September 2022); and 2. Approves the modification of such contract by increasing the council’s spend thereunder by £80,882.35 (i.e. from £250,400 to £331,282.35) due to (a) the need to broaden the scope of the implementation and support services required in order to integrate the Opentext system with a new version of the SAP system; and (b) the greater than expected complexity of the overall implementation as described more particularly in paragraph 3 of this report.
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Person(s) responsible for completing this assessment	Rodney Semple Programme Manager
Date of this assessment	5 th February 2024

2. Information and Data Collection

Summarise how you have collected the information and data required to assess the current situation (section 3.1 below) and the potential or actual impact of the proposed change (section 3.2 below) on those who share the protected characteristics and the additional groups (e.g. survey of services users, running community focus groups, analysing service usage data, engaging with staff networks). The actual information and data should be set out in Appendix 1 (Service Users) and Appendix 2 (GCC staff).

If there are any gaps, include an action in section 4 to fill these. This does not mean that you cannot complete the equality impact assessment, but you need to follow-up the action and revisit as part of the monitoring and review arrangements set out in section 5.

Stakeholders	Engagement and Consultation	Other Sources
Service Users / Wider Community	A multi-service project team was set up to produce the proposals and requirements for the new system and processes. This involved representatives from HR, finance, BSC, ICT, legal and commercial services. They were closely involved in developing the requirements specification with the project manager.	
Workforce	Given the broadening of access to the proposed system and the potential for service managers to have increased interaction then there is a need to communicate with and involve representatives from this group. This is being covered by the communications workstream of the implementation project. It is working closely alongside the change management function for the wider One Programme.	

Stakeholders	Engagement and Consultation	Other Sources
Partners	<p>Some records are held on behalf of Gloucester City Council as part of the ongoing payroll and HR service contract. The project manager and HR are working with the City Council to ensure that they know what is happening with the records and can input their views in terms of who can access what records in future.</p>	
Other	<p>The service is currently managed in-house. The system is being held on the council's MS Azure cloud hosting platform. This is overseen by Cantium Ltd on behalf of the council. Cantium have been closely involved in the configuration of the system.</p>	

3. Equality Assessment

Indicate the impact on each group and explain how you have reached your conclusions (i.e. through analysis of the information and data that was collected through the engagement, consultation and other sources / methods that were set out in section 2).

Consider sub-categories (e.g. different kinds of disabilities) and how the groups are interconnected (e.g. young women) resulting in particular needs or types of disadvantage and discrimination (sometimes known as intersectional or combined discrimination).

3.1 – Status Quo

If the proposal involves changing an existing activity (e.g. policy, service), summarise the key findings from your assessment of the current situation for each of the groups below. If the proposal is completely new, then move straight to section 3.2.

	Service Users	Gloucestershire County Council (GCC) Staff
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	Service Users	Gloucestershire County Council (GCC) Staff
Protected Characteristics (Equality Act 2010)	As the system involves the retention of staff and supplier records frontline service users will not be directly affected by its implementation.	<p>Very few individuals had access to the previous system which only held employee records. The staff with access were based in either the HR or Business Service Centre services. There are two main aspects of the new system that will change the staff experience:</p> <p>Firstly, it will be able to manage the records in a GDPR-compliant manner, meaning that they will only be held for appropriate durations and no longer. This should offer staff increased assurance that only appropriate data about their employment is being held.</p> <p>Secondly, the system is more flexible and can allow tailored access to be offered to a wider range of groups, beyond the original HR and BSC groups. This could involve managers and other employees have access to elements of the records. Staff therefore will need assurance that only appropriate personnel can access their records. They will also have the benefit of viewing at least some of the records themselves. As GCC staff reflect the protected characteristics of the wider population- although not necessarily in the same proportions – their different needs all need to be considered in the system configuration.</p>

	Service Users	Gloucestershire County Council (GCC) Staff
Additional Groups (including care leavers / care experienced adults)	As the system involves the retention of staff and supplier records the additional service user groups will not be directly affected by its implementation.	Again, GCC staff reflect the protected characteristics of the wider population- although not necessarily in the same proportions – so the different needs of the additional groups all need to be considered in the system configuration.

3.2 – The Proposed Change

Summarise your assessment of the likely or actual impact of the proposed change on each of the groups. If an action is required, this should be recorded in Section 4.

Service Users						
Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age		✓				
Disability		✓				N
Sex		✓				N

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Race		✓				N
Gender reassignment		✓				N
Pregnancy & maternity		✓				N
Religion and/or belief		✓				N
Sexual orientation		✓				N
Marriage & civil partnership		✓				N
Armed Forces community		✓				N
Carers		✓				N
Care leavers / care experienced adults		✓				N
Digital exclusion		✓				N
Geography, for example, urban and rural areas		✓				N
Socio-economic disadvantage		✓				N

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Vulnerable groups of society		✓				N
Interconnected Characteristics / Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
		✓				N
		✓				N

Gloucestershire County Council Staff

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Age	✓				Employees with this characteristic will have the benefit of increased assurance that their records are being retained only for appropriate periods and no longer. They may also be able to review parts of	N

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
					<p>these records and alert the council to any inaccuracies or misfiling.</p> <p>Opentext web site extract: <i>“We are further committed to ensuring all internet websites and web content will conform with WCAG 2.0 Level AA”</i>. The Web Content Accessibility Guidelines (WCAG) is an internationally recognised standard created by the World Wide Web Consortium (W3C). The purpose of the WCAG standard is to define how to “...make web content more accessible to people with disabilities.</p> <p>WCAG compliance was a requirement in the technical specification. In their tender response Opentext provided assurances that they meet the standard.</p> <p>WCAG compliance ensures several guarantees for users:</p> <ol style="list-style-type: none"> 1. Equal Access: WCAG compliance guarantees that digital content is accessible to everyone, regardless of their abilities. Users with disabilities can navigate, 	

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
					<p>interact, and consume information on websites and applications without barriers.</p> <ol style="list-style-type: none"> 2. Consistent Experience: When websites adhere to WCAG guidelines, users encounter a consistent and predictable experience. Elements like navigation menus, forms, and content presentation follow established patterns, making it easier for users to find what they need. 3. Navigational Clarity: WCAG compliance ensures that navigation elements are well-structured and labeled. Users can easily locate content, understand the purpose of links, and move seamlessly through the site. 4. Alternative Content: By providing alternative text for images, captions for videos, and transcripts for audio content, WCAG compliance guarantees that users with visual or auditory impairments can access information effectively. 5. Reduced Cognitive Load: Accessible design simplifies complex layouts, avoids distracting animations, and maintains clear 	

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
					<p>typography. This reduces cognitive load for all users, making content more digestible.</p> <p>6. Compatibility with Assistive Technologies: WCAG compliance guarantees compatibility with screen readers, braille displays, voice recognition software, and other assistive technologies. Users can interact with content using their preferred tools.</p> <p>7. Legal Protection: Organizations that comply with WCAG reduce the risk of legal action related to accessibility violations. Compliance demonstrates a commitment to inclusivity and user rights.</p> <p>In summary, WCAG compliance ensures that digital experiences are equitable, consistent, and user-friendly for everyone, regardless of their abilities or disabilities.</p>	
Disability	✓				As above.	N
Sex	✓				As above.	N
Race	✓				As above.	N
Gender reassignment	✓				As above.	N

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Pregnancy & maternity	✓				As above.	N
Religion and/or belief	✓				As above.	N
Sexual orientation	✓				As above.	N
Marriage & civil partnership	✓				As above.	N
Armed Forces community		✓				N
Carers		✓				N
Care leavers / care experienced adults		✓				N
Digital exclusion		✓				N
Geography, for example, urban and rural areas		✓			The system should be equally accessible by staff based in rural and urban areas, dependent on the council's ICT networks.	N
Socio-economic disadvantage		✓				N
Vulnerable groups of society		✓				N

Protected Characteristics / Additional Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?
Interconnected Characteristics / Groups	Positive Impact	Neutral Impact	Negative Impact	Not Sure	Summary of Impact	Action Required (Y/N)?

4. Action Plan

Set out the key actions that will be undertaken, following the equality assessment in section 3, to further maximise the positive impact or mitigate the negative impact of the proposal on the protected characteristics and additional groups prior to implementation (any negative consequences should be eliminated, minimised or counter-balanced by other measures):

Identified Potential or Actual Impact	Recommended Action(s)	Owner	Target Completion Date
The increased range of staff accessing the new system will increase the need for appropriate access controls to be built into the system.	Ensure that appropriate access controls are built into the system configuration.	Project manager	September 2024
Another impact of expanding the range of potential system users is that it becomes more important that accessibility and usage requirements reflect employees' needs and are adequately built into the system. These were laid out in the requirements specification but GCC must ensure that they are reflected in the actual configured system.	Ensure that system accessibility and usage criteria from the requirements specification are appropriately reflected in the system.	Project manager	September 2024

5. Monitoring and Review

Public bodies must have regard to the aims of the duty not only when a policy, service or development is being created and decided upon, but also when it is implemented and at regular intervals thereafter. The Equality Duty is a continuing duty.

Lead officer(s):	Project Manager
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Part 1 – Initial arrangements (up to around six months following implementation)

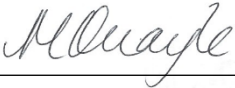
Date of the post implementation review:	October 2024 to March 2025
<p>Approach to <u>measuring the impact</u> of the change to enable a <u>comparison</u> between the <u>anticipated impact</u> (as set out in section 3) with the <u>actual impact</u>:</p> <ul style="list-style-type: none"> ▪ What mechanisms will be used? ▪ How will service users / the wider community / GCC staff and other stakeholders be involved? 	<p>The main areas of concern are around accessibility and access controls. We will assess accessibility through consultation with the initial system users to understand their experience of the system. The suitability of access controls will be covered as part of the user acceptance testing process prior to the system go live i.e. GCC will check that the actual system operation reflects the access requirements agreed with the implementation partner and summarised in the system blueprint and other background documentation.</p>


Part 2 – Ongoing arrangements (from around six months onwards)

Frequency of monitoring and review:	<p>This will become part of the business as usual operation the system. This responsibility will become the responsibility of the Business Service Centre and will be amalgamated with their quarterly performance monitoring process.</p>
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<p>What mechanisms will be used?</p> <p>How will service users / the wider community / GCC staff and other stakeholders be involved?</p>	<p>As per Part 1 above.</p>
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6. Approval

Signature of Senior Officer	
Name of Senior Officer	Mandy Quayle, Director of Digital and People Services
Date	03/04/2024

Signature of Decision Maker	
Name of Decision Maker	Cllr Lynden Stowe, Deputy Leader and Cabinet Member - Finance and Change
Date	03/04/2024

Appendix 1 – Service User Data and Information

Details of service users affected by the proposed activity:

Groups	Service User Data and Information
Age	N/A - as this is a back-office system that only affects council employees and some public sector customers directly. The public sector customers – Gloucester City Council and schools buying the HR/payroll service – will be similarly affected as GCC staff and therefore are covered by the section below.
Disability	
Sex	
Race	
Gender reassignment	
Pregnancy & maternity	
Religion and/or belief	
Sexual orientation	
Marriage & civil partnership	
Armed Forces community	See above.
Carers	See above.
Care leavers / care experienced adults	See above.

Digital exclusion	See above.
Geography, for example, urban and rural areas	See above.
Socio-economic disadvantage	See above.
Vulnerable groups of society	See above.

Appendix 2 – Gloucestershire County Council Staff Data and Information

Details of GCC staff affected by the proposed activity:

Groups	GCC Workforce Data and Information (based on reports for February 2021)		
Age	GCC Employees as 1st February 2021		4043
		Percentage of Workforce	Working Age Population of Gloucestershire
	16-25	6.28%	17.50%
	26-35	18.38%	18.50%
	36-45	21.07%	19.30%
	46-55	30.97%	23.90%
	56+	23.30%	20.80%
	Grand Total	100.00%	100.00%
Disability	DISABILITY		

Groups	GCC Workforce Data and Information (based on reports for February 2021)		
		Percentage of Workforce	Population of Gloucestershire
	Disabled	5.15%	16.71%
	Not Disabled	94.85%	83.29%
	Workforce stated	78.75%	
	Unstated	21.25%	
	Grand Total	100.00%	100.00%
	DISABILITY BY GENDER		
		Female	Male
	Disabled	4.13%	7.63%
	Not Disabled	95.87%	92.37%
	Stated	79.87%	76.17%
	Unstated	20.13%	23.83%
	Grand Total	100.00%	100.00%
Sex		Percentage of Workforce	Population of Gloucestershire
	Female	69.80%	51.00%
	Male	30.20%	49.00%
	Grand Total	100.00%	100.00%
Race	RACE		
		Percentage of Workforce	Population of Gloucestershire
	Asian	2.38%	2.10%
	Black	2.24%	0.90%

Groups	GCC Workforce Data and Information (based on reports for February 2021)																																
	Mixed Other White British White Other Workforce stated Unstated Grand Total	1.44% 0.47% 89.52% 3.94% 84.05% 15.95% 100.00%	1.50% 0.20% 91.60% 3.90% 0.00% 100.00%																														
Gender reassignment	Not available.																																
Marriage & civil partnership	<table border="0"> <thead> <tr> <th data-bbox="676 639 1205 687">MARITAL STATUS</th> <th data-bbox="1205 639 1429 791">Percentage of Workforce</th> <th data-bbox="1429 639 2045 791">Population of Gloucestershire</th> </tr> </thead> <tbody> <tr> <td data-bbox="676 791 1205 863">Divorced/Dissolved Civil Partnership</td> <td data-bbox="1205 791 1429 863">4.76%</td> <td data-bbox="1429 791 2045 863">9.50%</td> </tr> <tr> <td data-bbox="676 863 1205 903">Married/Civil Partnership</td> <td data-bbox="1205 863 1429 903">51.15%</td> <td data-bbox="1429 863 2045 903">50.50%</td> </tr> <tr> <td data-bbox="676 903 1205 943">Separated</td> <td data-bbox="1205 903 1429 943">2.35%</td> <td data-bbox="1429 903 2045 943">2.30%</td> </tr> <tr> <td data-bbox="676 943 1205 983">Single/Never Married</td> <td data-bbox="1205 943 1429 983">33.47%</td> <td data-bbox="1429 943 2045 983">30.50%</td> </tr> <tr> <td data-bbox="676 983 1205 1023">Widowed</td> <td data-bbox="1205 983 1429 1023">0.72%</td> <td data-bbox="1429 983 2045 1023">7.20%</td> </tr> <tr> <td data-bbox="676 1023 1205 1062">Rather not state</td> <td data-bbox="1205 1023 1429 1062">7.54%</td> <td data-bbox="1429 1023 2045 1062">-</td> </tr> <tr> <td data-bbox="676 1062 1205 1102">Workforce stated</td> <td data-bbox="1205 1062 1429 1102">41.01%</td> <td data-bbox="1429 1062 2045 1102">-</td> </tr> <tr> <td data-bbox="676 1102 1205 1142">Unstated</td> <td data-bbox="1205 1102 1429 1142">58.99%</td> <td data-bbox="1429 1102 2045 1142">-</td> </tr> <tr> <td data-bbox="676 1142 1205 1182">Grand Total</td> <td data-bbox="1205 1142 1429 1182">100.00%</td> <td data-bbox="1429 1142 2045 1182">100.00%</td> </tr> </tbody> </table>			MARITAL STATUS	Percentage of Workforce	Population of Gloucestershire	Divorced/Dissolved Civil Partnership	4.76%	9.50%	Married/Civil Partnership	51.15%	50.50%	Separated	2.35%	2.30%	Single/Never Married	33.47%	30.50%	Widowed	0.72%	7.20%	Rather not state	7.54%	-	Workforce stated	41.01%	-	Unstated	58.99%	-	Grand Total	100.00%	100.00%
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Groups	GCC Workforce Data and Information (based on reports for February 2021)		
	Buddhist Christian Hindu Jewish Muslim Other None Rather not state Workforce stated Unstated Grand Total	1.08% 42.01% 0.54% 0.23% 1.77% 2.23% 41.71% 10.45% 32.20% 67.80% 100.00%	0.30% 63.50% 0.40% 0.00% 1.00% 0.60% 26.70% 7.50% - - 100.00%
Sexual orientation	SEXUALITY Bisexual Gay Lesbian Heterosexual Rather not state Workforce stated Unstated Grand Total	Percentage of Workforce 1.54% 1.82% 1.04% 86.38% 9.21% 54.49% 45.51% 100.00%	Population of Gloucestershire 5% to 7%* 93-95%* - - - 100.00%
Armed Forces community			
Carers	Not available.		

Groups	GCC Workforce Data and Information (based on reports for February 2021)
Care leavers / care experienced adults	Not available.
Digital exclusion	Not available.
Geography, for example, urban and rural areas	Not available.
Socio-economic disadvantage	Not available.
Vulnerable groups of society	Not available.