

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

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| 1. Title of strategy, policy, plan, project, contract or major change to your service |
| Digital, Data and technology Strategy (DDAT Strategy) |

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| 2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available) |
| Agenda for Strategy and Resources Scrutiny Committee on Monday, 1st July, 2024, 5.30 pm - Cambridge Council |

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| 3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service? |
| To create a new five-year Digital, Data and Technology (DDAT) Strategy and implementation plan that replaces the previous (now lapsed) strategy. The new strategy has the following objectives and purpose: <ul style="list-style-type: none">• Clearly set out the Council's vision and framework for a strategic approach to data, digital and technology that includes the 'why', 'what', 'how' and 'when' and takes a whole Council approach. This will be an overarching strategy and will include or reference other digital, data and technology related key strategies, programmes and projects. |

- Be fully aligned to the wider Our Cambridge transformation programme and its wider ambitions, the corporate Target Operating Model (TOM), and is mapped to the Corporate Plan.
- Establish a core set of design and delivery principles to safeguard digital transformation across the organisation and develop consistent approaches across operational activities and projects including data standards, online content principles, and the technical design authority.
- Develop a Data and Information Management strand that enables the Council to realise the potential of its information assets by bringing together data held across multiple systems.
- Develop a clear vision for the longer-term plan for how the Council will interact with technology, learn from current and emerging trends, and use tech to create value and increase our organisational impact.
- Support the embedding of the new Digital Target Operating Model (DTOM) which defines the future working relationship between digital, data, technology and organisational design and strategy.
- Support learning and change within the organisation through a digital and data training and skills development programme.
- Clearly communicate and measure where we are on our digital transformation journey and where we aim to be.

The new strategy also responds to changes in post pandemic digital behaviour. For example, customers show an increased preference for digital self-service options, with 84% more inclined to do engage with organisations that offer this, but that frequently the self-service option is not as simple or user friendly that it could be.

4. Responsible Team – Transformation team

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- Residents
- Visitors
- Staff

Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

Residents who access our services online will be impacted as we will change the current digital offering – one strand for instance is around improvements to the digital customer journey which will make the Council’s approach more user friendly.

Staff will be impacted through changes in working practices to be more data driven and make better use of technology which may require some staff to upskill in these areas. It is intended that the systems that staff use will be made more efficient and user friendly and automated to work with other systems to reduce duplication of data entry and potential

errors. In addition, we hope to reduce the number of systems that some staff need to use, and automate processes where possible.

In addition, by improving our performance analysis ability through developing a data driven culture under this strategy, we can provide better information to staff on how they can improve the services they provide to residents, for example better targeting of services or benefits.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?

- New
 Major change
 Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)

- Yes
 No

If 'Yes' please provide details below:

3C ICT
Customer Services
Web and Digital team
Procurement
Legal
Environmental Health
Waste
Finance
Housing

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

Strategy & Resources Scrutiny Committee July 1st 2024

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

- A [Digital Access evidence base](#) has been created to consider the impacts on our customers
- [The state of the City Report](#) will also be used to identify customer groups that could be disproportionately impacted
- [Information from Human Resources on equalities monitoring data for Cambridge City Council](#)

- The Council's own policies and procedures for supporting staff

In addition, the following online information sources have been used to directly inform this EqIA:

- [Census Maps - Census 2021 data interactive, ONS](#) (Cambridge profile)
- [Web Content Accessibility Guidelines \(WCAG\) 2.2 \(w3.org\)](#)
- [Government Digital Service: Our strategy for 2021-2024 – Government Digital Service \(blog.gov.uk\)](#)
- [Exploring the UK's digital divide - Office for National Statistics \(ons.gov.uk\)](#)
- <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/full-report.html>
- ¹ [Exploring the UK's digital divide - Office for National Statistics \(ons.gov.uk\)](#) and [Internet users, UK - Office for National Statistics \(ons.gov.uk\)](#)
- [Managing Customer Expectations In A Changing Digital Landscape](#)
- [Over-70s are UK's most online adults after twentysomethings, survey shows](#)
- [Internet Accessibility: Internet Use by Persons with Disabilities: Moving Forwards](#)
- [Online Share of Census 2021 Responses, Cambridgeshire and Peterborough](#)

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

The strategy is likely to create the conditions for the introduction of new digital processes which may be challenging to older members of staff. National research indicates that older people are often associated with poor digital skills. As at March 2024, 31% of staff across the organisation are aged 55 or older. To mitigate this impact, an important element of this project is to look at upskilling staff that need additional support. Further context can be found in appendix A below.

The 2021 Census shows that Cambridge has a predominantly young population, with 69% between the ages of 16-64, attributed mainly to its large student population of 36,500. Nonetheless, the over-75 age group historically struggles with digital exclusion, primarily due to lacking digital skills and confidence. However, recent evidence from Age UK states that there has been an increase in older adults using the internet to engage online from 61% to 86%, which suggests that the skills and confidence gap is narrowing.

It is evident that many older individuals remain disconnected, highlighting that while the digital divide is narrowing, it still significantly effects older people. The strategy aims to

create a user-friendly digital experience for residents, enabling those who can engage online to do so, which will unlock capacity to increase support for those who are digitally excluded, to engage via non-digital methods with the Council (eg face-to-face, telephone etc) and therefore have a positive impact on this group. Our aim is to balance technology with human interaction to provide a seamless, efficient, and personalised customer experience.

The Council also supports local organisations such as Cambridge Online and the Cambridgeshire Digital Partnership to provide digital skills support and internet access.

(b) Disability

The strategy is likely to create the conditions for the introduction of new digital processes which may be more challenging for disabled customers and staff to use. National research indicates that disabled people are more likely to be digitally excluded especially relating to difficulty of accessing technology software and websites not adapted to the needs associated with impairments relating to their disability. As at March 2024, 7% of staff have been identified as having a disability. To mitigate this impact, an important element of this project is to look at improving digital accessibility and make reasonable adjustments where appropriate, which will support disabled staff members to use the new processes. More context can be found in strand 3 of appendix A below.

The 2021 Census shows that 15% of residents in Cambridge (City & Fringe) report having a long-term health problem or disability. Although this rate is lower than in comparable areas, there has been a notable increase over the last decade. Since 2011, an additional 8,100 residents in Cambridge have reported a long-term health condition or disability, making up 12.97% of the city's population. The strategy seeks to enhance accessibility by adhering to the Web Content Accessibility Guidelines (WCAG), and Government Digital Service (GDS) best practices, around developing services that work for the user, however complex the underlying systems, thereby promoting greater independence, participation, and equality.

The digital customer journey improvements intends to create better personalisation for residents. This could have a positive impact in enabling officers to tailor support to that individual according to their needs associated with their protected characteristics under the Equality Act 2010 for instance, by identifying where people have disabilities or long-term health conditions so might require reasonable adjustments to access services.

In addition, research following the Covid pandemic has cited positive aspects of engaging digitally and online by people with disabilities. This includes benefits as reduced travel time, greater choice, and an enhanced self of self by being able to access services from home. It is also cited as providing greater inclusiveness for people with disabilities and the potential to ensure persons with disabilities the means to live on a more equitable basis within the wider community.

(c) Gender reassignment

No impact has been identified specifically for this equality group.

(d) Marriage and civil partnership

No impact has been identified specifically for this equality group.

(e) Pregnancy and maternity

No impact has been identified specifically for this equality group.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

According to the 2021 Census and labour market statistics, Cambridge is more ethnically diverse than the national average, with 25.5% non-white residents compared to 18.3% nationally. Additionally, 38% of Cambridge’s population was born outside the UK, compared to a national average of 22.3%.

An important part of the strategy involves improving accessibility for our customers, the strategy gives the Council the opportunity to proactively aim to reach communities that are least likely to use its services but who might have high needs for them (such as Gypsy, Roma, and Traveller communities), people with complex needs relating to discrimination (for instance, it can be complex to support people experiencing domestic abuse that is mostly experienced by women as a result of patriarchy)

Provision for improved digital accessibility and user experience within the strategy may have a positive impact on this group of people. Further context can be found in strands 1 and 3 of Appendix A below.

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(g) Religion or belief

No impact has been identified specifically for this equality group.

(h) Sex

No impact has been identified specifically for this equality group.

(i) Sexual orientation

No impact has been identified specifically for this equality group.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).**

National research indicates that low-income households are disproportionately impacted in terms of their ability to access services digitally. Individuals with limited access to digital resources are four times more likely to come from low-income households compared to those with extensive access. Additionally, 85% of low-income adults consider connectivity essential in their daily lives.

However, it is yet unclear as to whether changes proposed within the strategy are likely to either positively or negatively impact this group.

(k) Care leavers

Care leavers are likely to face similar barriers to engage digitally as they have an increased likelihood of experiencing poverty, lower educational attainment and digital literacy.

An important part of the strategy involves improving accessibility for our customers, the strategy gives us the opportunity to proactively aim to reach care leavers who are also less likely to use our services, particularly digitally, but who might have high needs for them. More context can be found in strand 1 of appendix A below.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

Once the strategy is approved, we will create new EqIA's for each project that is created to deliver the strategy. This will allow us to monitor new equalities impacts throughout the life of the strategy.

12. Do you have any additional comments?

See Appendix A for additional context on equalities impacts relating to each strand of the strategy and relating to the strategy's impact on our ability to comply with the Public Sector Equality Duty.

13. Sign off

Name and job title of lead officer for this equality impact assessment: Dominic Burrows, Project Manager

Names and job titles of other assessment team members and people consulted: Helen Crowther (Equality and Anti-Poverty Officer), Michelle Lord (Project Sponsor)

Date of EqIA sign off: 1 June 2024

Date of next review of the equalities impact assessment: 1 June 2024

Date to be published on Cambridge City Council website: 15 July 2024

All EqIAs need to be sent to the Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk

Appendix A

Equality impacts of the DDAT Strategy

As the DDAT Strategy is still relatively high-level, it is difficult to identify all of the impacts relating to specific equality groups. The main Equality Impact Assessment above considers impacts for each characteristic protected under the Equality Act 2010 in turn, as well as for people experiencing poverty/low-income and people with care experience. This appendix provides some further context on a strand-by-strand basis. Impacts for the DDAT on each of these groups will become clearer once individual projects are developed under the four strands of the strategy and individual EqIA forms will be produced for each project using the council's standard template.

The information in this document and appendix will be used by the decision-makers at the Strategy & Resources Scrutiny Committee to support them in ensuring due regard is made to the Public Sector Equality Duty in their decision on whether or not to adopt the DDAT Strategy.

Stand One – Data and Information Management

It is hoped that the data and information management strand of the strategy will support the council in ensuring it has rich, interconnected data that enables staff to make well-informed decisions, ensuring that resources are allocated effectively, and that solutions are tailored to needs of specific and diverse communities. Key to the council's decision-making process is its legal obligation to pay due regard to the Public Sector Equality Duty and work under this strand of the strategy will help improve data the council has to draw on as part of this process. If the data is held centrally, as is proposed, then it will be more easily available to use.

Moreover, if we improve our performance analysis ability through developing a data driven culture under this strand, then we can better meet our legal obligation to publish information on people affected by policies and practices (for example, service users) annually. (This is also described by government as publishing info on general duty compliance with regard to people affected by your policies and practices every year.)

Under this strand, integrating disparate data systems may mean that customers' support might be more holistic – officers may have opportunity to more easily identify key info on customers who have been in touch with other teams. This could have a positive impact in enabling officers to tailor support to that individual according to their needs associated with their protected characteristics under the Equality Act 2010 (or needs as care leavers, which Cambridge City Council also treats as a protected characteristic) – for instance, by identifying where people have disabilities or long-term health conditions so might require reasonable adjustments to access services.

It is hoped that implementing measures to foster better use of data across CCC will support digital channel shift, enabling automation of high-volume, low complexity tasks by customers, and thereby freeing up the Council workforce to spend more time on higher complexity customer interactions. The council would have more opportunity to proactively

aim to reach communities least likely to use its services but who might have high needs for them (such as Gypsy, Roma, and Traveller communities¹ and care leavers), people with complex needs relating to discrimination (for instance, it can be complex to support people experiencing domestic abuse that is mostly experienced by women as a result of patriarchy) and/or people experiencing health issues or health inequalities, or groups most likely to be digitally excluded like older people and disabled people².

In strengthening our information management as the strategy proposes, council staff will be better versed in ethical data usage, and how this sits alongside our legal responsibilities. This includes our legal responsibilities to publish information to demonstrate understanding of who is affected by our policies and practices, which can be obtained through equalities monitoring that must be balanced with our GDPR responsibilities.

Strand Two – Technology and Innovation

The priorities under this strand are to (1) improve systems and processes to ensure the effective technology management, procurement, and outsourcing, and (2) streamline and modernise the Council's IT estate. In streamlining the digital experience for users, the strategy mentions ensuring that systems are current and adaptable and that they will support a range of user-centric initiatives, including advanced technologies like artificial intelligence (AI). AI is scaling across industries and functions but has the potential to be riddled with unconscious biases that can cause discrimination and/or unequal opportunities to access services and entitlements (for instance, see: [This is how AI can support diversity, equity and inclusion | World Economic Forum \(weforum.org\)](#)). The strategy proposes a focus on user-centric service design in taking advantage of new technologies to help ensure that Council services are not only technically sound but also deeply resonant with community needs, which can counter this unconscious bias.

Strand 3 – Digital Customer Journey

The Digital Customer Journey strand means reorienting the Council's approach to be more user centric. This extends to ensuring comprehensive accessibility for all users across digital and online services in line with CCCs accessibility guidance as well as the latest national accessibility standard (WCAG).³ Following these guidelines will make content more accessible to a wider range of people with disabilities, including accommodations for blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these, and some accommodation for learning disabilities and cognitive limitations; but will not address every user need for people with these disabilities. As well as complying with the WCAG, this strand of the strategy will adhere to the Government Digital Service (GDS) best practices, around developing services that work for the user, however complex the underlying systems⁴.

¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/full-report.html>

² [Exploring the UK's digital divide - Office for National Statistics \(ons.gov.uk\)](#) and [Internet users, UK - Office for National Statistics \(ons.gov.uk\)](#)

³ [Web Content Accessibility Guidelines \(WCAG\) 2.2 \(w3.org\)](#)

⁴ [Government Digital Service: Our strategy for 2021-2024 – Government Digital Service \(blog.gov.uk\)](#)

Cambridge City Council recognises that some groups are more likely to experience digital exclusion, especially older people, disabled people, people experiencing poverty/ low-income and some people from ethnic minority communities for whom English is a second language. For these groups reasons for digital exclusion relate to affordability of technology and/or the internet, low IT skills, and/or where equipment and websites cannot be adapted to meet needs caused by impairments relating to specific disabilities. An important element of the strategy is adhered to high standards of accessibility and user-friendliness to ensures that all community members, regardless of their abilities or tech-savviness, can effortlessly navigate and benefit from the Council's services. The strategy estimates improved digital accessibility for 18,715 people because of its implementation. The strategy identifies the need to engage in user research to understand the diverse needs and preferences of residents (which will provide evidence to inform an EqIA on this strand of the strategy or EqIAs on projects within it). The strand also involves strategizing and planning non-digital counterparts for each digital service that consider various non-digital formats such as phone services, in-person assistance, and paper forms. This is in recognition that there will always be a small cohort of people who will be digitally excluded.

Strand 4 – Digital and Data Skills and Development

The overarching objective of the digital and data skills development strand is to provide a training programme and further develop the Council workforce's digital and data skills, as part of becoming a data-driven organisation. As at March 2024, 31% of staff across the organisation are aged 55 or older. Whilst many will be using IT already, national research⁵ indicates that the older you are the more likely you are to be digitally excluded, which relates to skills gaps between older and younger people – government research found that many older people expressed the feeling that it is simply too late in life for them to start learning digital skills.

As part of becoming a data driven organisation, this strand might lead to future employment of data-related roles like data analysts, who focus beyond traditional service boundaries. This could be helpful for monitoring the council's overall impact relating to its Public Sector Equality Duty, which applies across all council teams and can cut across different areas of work across the council.

⁵ [Exploring the UK's digital divide - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)