

# Equality Impact Assessment

Section 1: Executive Summary	
1.1	<p><b>Title of policy (or decision)</b></p> <p>Replacing the content management system and front-end application for essex.gov.uk</p>
1.2	<p><b>Describe the main aims, objectives and purpose of the policy (or decision)</b></p> <p>To migrate essex.gov.uk to a new technology platform, under a service agreement with a digital agency partner.</p> <p>Through investment in a new website technology platform, introduce the capability to decommission and migrate legacy digital services.</p> <p><b>What outcome(s) are you hoping to achieve? Refer to strategic aims / strategic priorities in Organisation Strategy</b></p> <ul style="list-style-type: none"> <li>• Make it easier for people to access and use council digital services</li> <li>• Better meet and respond to the needs of people with a disability</li> <li>• Comply with relevant accessibility legislation</li> <li>• Comply with relevant data privacy legislation</li> <li>• Increase our capability to innovate and iterate digital services</li> <li>• Improve the recruitment and retention of key staff in Service Transformation</li> <li>• Reduce in-house dependency on expensive and hard to recruit technology services staff</li> </ul>
1.3	<p><b>Is this a new policy (or decision) or a change to an existing policy, practice or project?</b></p> <p>A new project</p>

## Section 2: Assessing the Equality Impact

Use this section to record how you have assessed any potential impact on equality groups. What is known about the population likely to be affected which will support your understanding of the impact of the policy (or decision)? Consider any consultation / data as supporting evidence (e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information). An opportunity to explain impacts on specific protected groups is provided later on this form

The digital services that this platform will support are for all residents in Essex and anyone who visits or does business in Essex. With such a universal service offer we base our initial assumptions on national data about disability and people's access needs [Family Resources Survey - GOV.UK \(www.gov.uk\)](#). This data finds that about 1 in 5 people have a disability.

To better understand the needs of Essex Residents we use local health data and research that's available at [Essex Open Data](#). This data, combined with website usage statistics and user feedback helps us to better understand local needs.

All of this data is useful in helping us understand some of the broader needs of our service users, but our primary research data is derived from qualitative user experience research. The council's digital delivery teams conduct regular primary user research (structured interviews, observation, user experience testing). This research always includes people with a wide range of access needs, so that we can better understand the lived experiences of people with physical and cognitive disabilities. We also make sure to recruit people from across the protected characteristics, to reduce the potential for bias in our research insights.

### Does or will the policy or decision affect:

Service users	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Employees	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
The wider community or groups of people, particularly where there are areas of known inequalities	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

Which geographical areas of Essex does or will the policy or decision affect (e.g. Borough/City/District/All Essex)

All Essex	<input checked="" type="checkbox"/>	Colchester	<input type="checkbox"/>
Basildon	<input type="checkbox"/>	Epping Forest	<input type="checkbox"/>
Braintree	<input type="checkbox"/>	Harlow	<input type="checkbox"/>
Brentwood	<input type="checkbox"/>	Maldon	<input type="checkbox"/>
Castle Point	<input type="checkbox"/>	Rochford	<input type="checkbox"/>
Chelmsford	<input type="checkbox"/>	Tendring	<input type="checkbox"/>
		Uttlesford	<input type="checkbox"/>

Will the policy or decision influence how organisations operate?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
Will the policy or decision involve substantial changes in resources?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>

Is the new or revised policy linked to a digital service (website, system or application)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<p>Please describe the steps you have taken to:</p> <ul style="list-style-type: none"> <li>• meet the digital accessibility requirements</li> <li>• test the accessibility of the website, system or application</li> <li>• maintain accessibility once it has gone live</li> </ul> <p><b>Meeting digital accessibility requirements</b></p> <p>The proposed technology, Localgov Drupal, is a collaborative project between more than 20 councils and has been funded by central government. One of the key objectives was to develop technology that meets the current accessibility regulations and continues to iterate in response to changing standards.</p> <p>The product has been designed to meet or exceed WCAG 2.1 AA standards. This is not just for the citizen-facing elements, the content management publishing interfaces have also been designed to be used by colleagues who have access needs. As an open source community product that is owned by local government, maintaining high standards for accessibility will remain a priority.</p> <p><b>Test the accessibility of the website, system or application</b></p> <p>Ensuring accessibility is a team sport, which means responsibilities will extend to all members of the delivery team.</p> <p>The new platform implementation and future migration work will be managed as a user-centred agile programme of work – which has continuous testing with users as an integral part of delivery. The service transformation team aim to include users with disabilities in all rounds of research. A full time user researcher will be working on the project and will be a member of the “business as usual” team running the live service. This means we are able to make a technical assessment of the product’s accessibility and validate this with real service users who can give us additional insight to inform design decisions.</p> <p>The service designers, interaction designers, content designers, developers and delivery managers in the service transformation team all have expertise in designing for accessibility. It will also form a key requirement in the procurement of a technology partner, who will need to provide evidence of their technical understanding and that it forms part of their culture and ways of working.</p> <p><b>Maintaining accessibility once it has gone live</b></p> <p>The Service Transformation team is a centre of excellence for digital accessibility, with a strong track record of designing and supporting accessible digital services. Regular automated technical testing, user feedback and ongoing user research will be built into the live service. The website (<a href="http://essex.gov.uk">essex.gov.uk</a>) will have a product manager and delivery team who hold responsibility for maintaining accessibility and continuing to improve the service offer for people with additional access needs.</p>		

### Section 3: Description of Impact

Description of impact	Nature of impact Positive, neutral, adverse (please explain your reasons)	Extent of impact Low, Medium, High (please explain your reasons)
<p><b>Age</b></p> <p>A digital service that is designed to work well for the needs and preferences of a wide range of age groups</p>	<p>Positive – improvements to our main digital platform will enhance the service offer for all of our residents.</p> <p>Progressive enhancement (mobile first design) will ensure the service is easy to use for the increasing proportion of residents who use mobile devices (typically younger cohorts)</p> <p>Accessible design approaches and testing with older residents will ensure the service works well for older people – for example, being able to magnify content on your device so that changes in people’s eyesight as they age does not prevent access</p>	<p>Medium – the existing platform performs well for accessibility, so while there won’t be a significant initial improvement the impact over time will increase.</p>
<p><b>Disability – learning disability</b></p>	<p>Positive – making things easy to read and using plain English is a design principle the team adhere to.</p> <p>In practice this means</p> <ul style="list-style-type: none"> <li>• keeping sentences short</li> <li>• not using figures of speech</li> <li>• replacing complex words with simple alternatives</li> <li>• avoiding words that are known to cause problems for people</li> </ul>	<p>Low – the existing platform performs well for clarity of content</p>

<b>Disability – mental health issues</b>	<p>Positive – for people with anxiety we follow design standards that:</p> <ul style="list-style-type: none"> <li>• give users enough time to complete a task</li> <li>• explain what will happen after they complete a task</li> <li>• make important information clear</li> <li>• give people the support they need to complete a service</li> <li>• let users check their answers before submitting</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>
<b>Disability – physical and sensory impairment</b>	<p>Positive – for people on the autistic spectrum we follow design principles that:</p> <ul style="list-style-type: none"> <li>• use simple colours</li> <li>• write in plain language</li> <li>• use simple bullets and sentences</li> <li>• make buttons descriptive</li> <li>• build simple and consistent layouts</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>
	<p>Positive – for people who use screenreaders we follow design and technical standards that:</p> <ul style="list-style-type: none"> <li>• describe images and provide transcripts</li> <li>• follow a linear and logical layout</li> <li>• structure content using HTML5</li> <li>• build for keyboard only users</li> <li>• write descriptive links and headings</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>
	<p>Positive – for people who have low vision we follow design standards that:</p> <ul style="list-style-type: none"> <li>• use good colour contrast and a readable font size</li> <li>• publish information as HTML (not PDF)</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>

	<ul style="list-style-type: none"> <li>• use a combination of colour, shapes and text</li> <li>• follow a linear, logical layout</li> <li>• put buttons and notifications in context</li> </ul>	
	<p>Positive – for people with dyslexia we follow design standards that:</p> <ul style="list-style-type: none"> <li>• use images and diagrams to support text</li> <li>• align text to the left and keeps a consistent layout</li> <li>• produce content in alternative formats</li> <li>• keep content short, clear and simple</li> <li>• let users change the contrast between background and text</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>
	<p>Positive – for people with physical or motor disabilities we follow design standards that:</p> <ul style="list-style-type: none"> <li>• make large clickable actions</li> <li>• give clickable elements space</li> <li>• design for keyboard or speech only use</li> <li>• design with mobile and touchscreens in mind</li> <li>• provide shortcuts</li> </ul> <p>Positive – for people who are deaf or hard of hearing we follow design standards that:</p> <ul style="list-style-type: none"> <li>• write in plain language</li> <li>• use subtitles or provide video transcripts</li> <li>• use a logical linear layout</li> <li>• break up content with sub headings</li> </ul>	<p>Medium – the flexibility of the new platform will allow a wider range of design choices</p> <p>Medium – the flexibility of the new platform will allow a wider range of design choices</p>

<b>Gender / Sex</b>		<i>n/a</i>
	<i>n/a</i>	
<b>Gender reassignment</b>	<i>n/a</i>	<i>n/a</i>
<b>Marriage / civil partnership</b>	N/A	N/A
<b>Pregnancy / maternity</b>	<i>n/a</i>	<i>n/a</i>
<b>Race</b>	<i>n/a</i>	<i>n/a</i>
<b>Religion / belief</b>	<i>n/a</i>	<i>n/a</i>
<b>Sexual orientation</b>	<i>n/a</i>	<i>n/a</i>
<b>Salary</b>	Positive – the delivery team adhere to government service	Low – the data consumed by a council website is low

	standard and technology code of practice principles, which includes designing digital services that work well on older devices. Digital services are optimised to reduce the amount of data consumed to operate the service. This means using less of a users data allowance to function, which is a concern for people on low incomes.	compared to using social media and streaming services.
I confirm that I have considered the potential impact on all of the protected characteristics Y <input checked="" type="checkbox"/>		
<p>Describe any actions that have already been taken to mitigate negative impacts on any of the protected characteristics.</p> <ul style="list-style-type: none"> <li>• There are no negative impacts identified in the EQIA</li> </ul>		



## Section 4: Action plan to address and monitor adverse impacts

Does your EqlA indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?

Y ☐ N ☒

If 'YES', use the space below to describe what mitigating actions you could put in place to address any adverse impacts identified

What are the mitigating actions?

Date they will be achieved?

## Section 5: Sign off

**I confirm that this initial analysis has been completed appropriately.  
(A typed signature is sufficient.)**

Signature of person completing the EqlA:

Date: 21/02/2022

Ben Unsworth

Names and contact details:

Ben Unsworth  
Director, Service Transformation  
ben.unsworth@essex.gov.uk

Your function, service area and team:

People and Transformation, Service Transformation

If you are submitting the EqlA on behalf of another function, service area or team, specify the originating function, service or team area

Signature of Head of Service: Ben Unsworth	Date: 21/02/2022