

Equality Impact Assessment (EqIA)

Deciding what needs to be assessed

In theory all policies, decisions, services, projects, and programmes should be impact assessed. The most practical approach is to assess as the proposal is being developed or as processes, services and policies come up for review making the EQIA part of the development process. Do not be put off by the list below, it does not mean that long and detailed assessments are required every time you are engaged in one of the activities. However, it does mean that you should always consider the equalities implications of your proposals.

Policy

- New policy development
- Substantial revision of an existing policy or process
- Any change which may have a disproportionate impact on a particular group

Decision

- Key decision
- Decision for management board/cabinet
- Budget change decision

Service

- New service
- Service review, including the decommissioning of services
- Any service change which may have a disproportionate impact on a particular group

Projects and programmes

- All, at planning stage

Further information: [Equality Impact Assessments - a user's guide](#)

Section one

No.	Question	Response
1.1	Name of policy/ decision/ service/ project/ programme being assessed	Digital Services Platform continuity, procurement and implementation programme, covering Swindon Borough Council's corporate website and content management system, digital forms and low-code workflows, citizen account functionality and customer relationship management capability.
1.2	Summary of aims and objectives of the policy/ decision/ service/ project/ programme	The aims of this programme are to: • maintain uninterrupted access to the Council's business-critical Digital Services Platform beyond the end of the current contract • procure and implement a reliable, secure and resilient platform for the Council's main digital channel and online service delivery • ensure the Council can continue to publish statutory, transparency and service information online • meet accessibility and inclusion requirements, including Web Content Accessibility Guidelines (WCAG) 2.2 AA • support clear and accessible digital forms, workflows, citizen accounts, case management and online transactions • maintain appropriate non-digital and assisted access routes for residents who cannot use online services • manage accessibility, equality and service continuity risks during any implementation, data migration or transition • achieve value for money and provide a sustainable foundation for future digital service improvement The core equality considerations apply regardless of the interim procurement route.

		However, the likelihood and scale of impacts may differ depending on the route and supplier outcome. Continuity with the incumbent supplier would largely maintain the current service and any existing barriers, while selection of a different supplier could introduce additional implementation, data migration, accessibility and service continuity risks. The EqIA will therefore be reviewed when the interim route and supplier outcome are confirmed.
1.3	Who is affected by the policy/ decision/ service/ project/ programme? (For example, employees/ service users/ supplier/ contractor)	This programme affects: • Residents and service users who access information, complete online forms, make payments, track requests, and receive updates • People with accessibility needs or protected characteristics, particularly disabled residents and older residents who may face barriers if the platform is not accessible or easy to use • Residents who may be digitally excluded, for example due to limited digital skills, language barriers, limited access to devices or connectivity • Council colleagues and teams who publish content, manage online forms and workflows, handle cases, and respond to customer contact • Council colleagues with accessibility needs who use the content management system, forms, workflows, customer relationship management system and other administration interfaces • Elected members, partners and stakeholders who rely on the Council's website and online processes Evidence about the scale and importance of the current service includes:

		• The platform supports the Council's corporate website and associated satellite websites • It supports more than 350 online forms and associated workflows • It supports statutory publishing, online payments, citizen accounts, notifications, integrations and case handling • Disruption or loss of accessibility could affect residents' ability to obtain information, report issues, apply for services, make payments and track requests The platform is used by the whole community, but its design and availability may have a greater impact on disabled people, older people, children and young people, residents with limited English, people with limited digital access or confidence, and people using services involving sensitive personal information. Local context that informs this assessment includes: • Swindon's population is around 233,400 • Swindon has a diverse population, with 11.6% of residents identifying as Asian, Asian British or Asian Welsh and 81.5% identifying as White • Census 2021 indicates an age-standardised disabled population made up of 6.9% disabled and limited a lot, and 10.0% disabled and limited a little • 76.7% of residents report being born in England and 5.9% report being born in India, which is relevant when considering language and content accessibility needs Office for National Statistics (2022) <i>How the population changed in Swindon: Census 2021</i>. Available at: Office for National Statistics (Accessed: 27 February 2026). Office for National Statistics (2023) <i>How life has changed in Swindon: Census 2021</i>. Available at: Office for National Statistics (Accessed: 27 February 2026).
1.4	What involvement and consultation has been done in	Involvement and consultation completed to date includes:

	relation to this proposal? (For example, with relevant groups and stakeholders)	• internal stakeholder engagement to confirm the scope and requirements for the Digital Services Platform, including accessibility, usability, operational continuity and integration needs • two cross-Council workshops to capture functional and non-functional requirements, involving IT, enabling services, service representatives and current platform users • engagement with Digital, Data and Technology, Procurement, Information Governance, Finance, Customer Services and other relevant corporate functions • review of current platform use, known accessibility issues, service delivery needs and operational dependencies • identification of resident feedback, complaints, accessibility monitoring and service insight as evidence sources for ongoing review No direct consultation with residents or protected characteristic groups has yet been undertaken specifically for this EqIA. Planned involvement will include: • engagement with Council colleagues who will use the platform's administration, content, forms, workflow and case management interfaces • internal testing of priority journeys before go-live, followed by improvements based on evidence and feedback
1.5	What are the arrangements for monitoring and reviewing the actual impact of the policy/ funding activity/ event?	The following monitoring and review arrangements will apply: • Accessibility and inclusion requirements: The person leading this EqIA, supported by the Digital Services Platform project leads and Senior Responsible Officer, will ensure that accessibility and inclusion requirements are included in the specification, assessment

		and contract documentation before any interim contract is awarded. • Accessibility assurance: The project team, Web Team and supplier will test public-facing services and relevant administration interfaces during implementation and before go-live. Identified defects will be recorded, prioritised and subject to agreed remediation timescales. • Alternative access and assisted support: Customer Operations and relevant service owners will confirm that appropriate telephone, face-to-face or supported routes remain available before any service is changed or migrated. • Privacy and confidentiality: Information Governance and relevant service owners will review personal data, access controls, notifications and confidentiality arrangements through the Data Protection Impact Assessment and service design process. • Service performance: The platform and contract management leads will monitor completion rates, drop-off points, accessibility issues, complaints, feedback, avoidable contact, incidents and supplier performance after go-live. • Corrective action: Service owners, the Web Team and the supplier will investigate and address evidence that a service is creating an accessibility or equality barrier. The EqIA will be formally reviewed: • before final approval and award of the interim continuity arrangement • after any interim supplier selection where implementation or data migration would be required • when the implementation, data migration and cutover approach is confirmed • before go-live
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		• between three and six months after go-live • as part of ongoing annual service and contract management The person leading this EqIA, supported by the Digital Services Platform project leads and Senior Responsible Officer, will ensure that the reviews take place and that actions are recorded, assigned and completed.
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Section two – protected characteristics

The key requirements and controls underpinning the actions below were included in the original Digital Services Platform specification and have been retained for this procurement. Should the procurement result in a change of supplier or platform, the selected solution will be assessed against these requirements before implementation and go-live.

Protected characteristic group	Is there a potential for positive or negative impact? Is the impact neutral?	Please explain and give examples of any evidence/data used	Action to address negative impact (for example, adjustment to the proposal)
Disability	Potential positive and negative impact.	The Digital Services Platform is the Council's main digital channel for accessing information and completing transactions. Disabled residents, including those who use assistive technology or have visual, hearing, motor or cognitive impairments, could be disadvantaged if website templates, content, forms, workflows and account journeys are not accessible. Disabled Council colleagues could also be disadvantaged if the content management, forms, workflow, case management or reporting interfaces, supporting documentation and training are not accessible.	Make WCAG 2.2 AA compliance a mandatory requirement in the specification. Require suppliers to evidence accessibility and compatibility with assistive technologies (for example screen readers and keyboard-only navigation). Build accessibility testing into mobilisation and acceptance, including defect remediation timescales. Maintain accessible alternative routes during any cutover and clearly signpost support. Require accessibility assurance for relevant supplier administration and

		Accessible digital services can increase independence, choice and access to Council information and services for disabled residents. Accessible administration interfaces can also help disabled colleagues carry out their roles effectively.	authoring interfaces, as well as public-facing templates and journeys. Ensure training materials, supplier documentation and support arrangements are accessible. Identify and provide reasonable adjustments for colleagues who need them.
Gender reassignment	Neutral overall. Potential for negative impact if privacy, dignity, and confidentiality are not protected in relevant service journeys.	The platform supports citizen accounts and case management. Some service journeys may involve sensitive personal information. Poor design, unnecessary data capture, or weak access controls could increase the risk of inadvertent disclosure and undermine trust.	Use inclusive language and avoid unnecessary disclosure in forms and account journeys. Do not ask for protected characteristic data unless it is necessary and justified. Where equality information is collected for monitoring purposes, follow the GOV.UK Design System pattern for asking users for equality information, including making clear that the questions are separate from the main service questions, explaining why the information is being collected and making the questions optional. Require role-based access controls, audit trails, and secure handling of personal data.

			Complete Data Protection Impact Assessment (DPIA) activity for relevant processing and test supplier security and privacy controls during implementation.
Marriage or civil partnership	Neutral overall.	No platform-level impacts are anticipated. Any impacts would come from how individual services design their forms and eligibility questions.	Ensure service journeys do not assume household arrangements. Where relevant, allow appropriate choices.
Pregnancy and maternity	Neutral overall. Potential for negative impact if journeys are lengthy, time-limited, difficult to use on mobile devices or cannot be paused and resumed.	The platform does not target or restrict access based on pregnancy or maternity. However, lengthy or time-limited forms, inflexible appointments, session timeouts and journeys that cannot be saved may create additional barriers for people who need to pause a transaction because of health needs, appointments or caring responsibilities.	Specify mobile-first, responsive design, and straightforward form completion. Require clear guidance, effective error handling, and accessible layouts. Provide save and return where appropriate. Maintain and signpost alternative channels for those who cannot complete online. Avoid unnecessary session timeouts and warn users before a session expires.

			Ensure important journeys can be paused and resumed where appropriate.
Race	Potential positive and negative impact.	Residents with limited English, low confidence or unfamiliarity with council terminology can be disadvantaged by complex wording, unclear instructions, and inaccessible content. This can reduce completion rates and increase reliance on other support channels. Clear, well-structured content and forms can improve access for residents with limited English and reduce reliance on other support channels.	Apply plain English and consistent content standards across the website and forms. Ensure forms have clear labels, guidance, and error messages. Design content and forms using plain English, clear structures, and consistent terminology so they work effectively with browser translation and other language support tools. Monitor feedback, drop-off points and contact reasons and improve journeys where barriers are identified. Do not rely on browser translation as the only response to language barriers. Ensure information about interpretation, translation or supported assistance is available for important or complex services where required.

			Use feedback and service data to identify journeys where language may be preventing completion or access.
Religion or belief	Neutral overall. Potential for negative impact if content or forms make assumptions or are not inclusive.	Platform level impacts are not expected. Risks arise from content and form design choices that may unintentionally exclude, stereotype, or make assumptions about residents' beliefs.	Use inclusive language and avoid assumptions in content, examples, and imagery. Provide guidance for content designers and service owners on inclusive content. Maintain appropriate privacy controls where sensitive information could be disclosed.
Sexual orientation	Neutral overall. Potential for negative impact if privacy and confidentiality are not protected in sensitive service journeys.	Some service enquiries may be sensitive. If access control, audit trails and colleague handling are weak, there is a risk to dignity and confidentiality and reduced trust in using online services.	Do not ask for protected characteristic data unless it is necessary and justified. Where equality information is collected for monitoring purposes, follow the GOV.UK Design System pattern for asking users for equality information, including making clear that the questions are separate from the main service questions, explaining why the information is being collected and making the questions optional. Require role-based access controls and audit trails for case handling.

			Complete DPIA activity for relevant processing and ensure colleague guidance supports secure handling of sensitive information.
Sex (gender)	Neutral overall.	The platform is used by all residents and does not target or restrict access based on sex. Any differential impacts are more likely to arise from individual service journeys and content design rather than the platform itself.	Ensure templates and forms are accessible, easy to understand and usable on mobile devices. Maintain non-digital routes and trusted support routes where required. Monitor feedback and completion issues and improve journeys where barriers are identified.
Age	Potential positive and negative impact.	Older residents may have lower digital confidence, limited access to devices or accessibility needs. Children and young people may also experience barriers if information, language, account requirements or service journeys are not appropriate for their age or circumstances. Complex navigation, unclear content and inaccessible forms may reduce people's ability to complete tasks independently.	Maintain a digital-first, not digital-only approach. Maintain non-digital routes and trusted support routes where required. Specify readable templates, clear navigation, plain English content, and accessible error messaging. Use age-appropriate language and provide routes to support for services aimed at children and young people. Do not assume digital confidence or capability based only on age.

		Simple and accessible digital journeys can support greater independence for older residents and improve access for children and young people where services are designed around their needs.	
Children in care and care leavers	Potential positive and negative impact.	This group may be affected by how information is presented, how support is accessed and how confidentiality is protected. Poorly designed journeys can create barriers, reduce trust, and increase reliance on other support channels. Clear, secure and supportive digital journeys can make it easier to access help and reduce the need to repeat sensitive personal information.	Ensure content is clear and supportive, with straightforward routes to help. Protect confidentiality through role-based access, audit trails, and careful notification design. Maintain non-digital routes and trusted support routes where required. Review notification and contact preferences to avoid unintended disclosure (for example, letters, emails, SMS).
Digital exclusion (not a protected characteristic, but an equality consideration)	Potential positive and negative impact.	The Digital Services Platform supports the Council's corporate website, satellite websites, online forms, account access, and case management interactions. A digital platform can unintentionally disadvantage residents who are digitally excluded, including people	Maintain a digital-first, not digital-only approach, with clear alternative routes (telephone, face-to-face and supported routes) alongside online services. Ensure the platform supports clear, simple, mobile-friendly journeys with plain English content, helpful error messages, and accessible layouts.

		without reliable internet access or devices, people who rely on mobile-only access, people with low digital confidence, and people who need support to complete online tasks. Digital exclusion can intersect with protected characteristics (for example, age and disability) and with wider vulnerability (for example, low income or crisis situations). Digital exclusion may also arise from low income, the cost of mobile data, mobile-only access, a lack of private or secure access to a device, limited literacy, or confidence and concerns about sharing personal information online. Mobile-friendly, low-data journeys and clearly signposted non-digital support can improve access for some residents who currently experience digital barriers.	Provide assisted digital support where appropriate and ensure it is clearly signposted from relevant webpages and forms. Monitor completion rates, drop-off points, customer feedback and contact reasons to identify where digital barriers are causing avoidable contact or exclusion, then improve journeys through continuous iteration. Ensure priority journeys are usable on lower-cost mobile devices and do not require excessive data use or unnecessary downloads. Avoid making an online account mandatory unless it is necessary and justified. Ensure residents can identify and use an alternative route without first having to complete a failed digital journey.
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Section three – evaluation

No.	Question	Explanation/justification
3.1	Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	Yes. A digital platform could discriminate or unfairly disadvantage people if it is inaccessible, difficult to use, dependent on digital access, inappropriate for particular users or unable to protect sensitive personal information. Potential impacts identified through this assessment include: • inaccessible public-facing or administration interfaces • digital exclusion • language and literacy barriers • confidentiality and unintended disclosure • the loss of appropriate non-digital or assisted access • service disruption or reduced access during implementation, data migration or cutover These impacts do not prevent the programme from proceeding, but they require the adaptations and controls set out in Section 2. Accessibility, inclusion, privacy, user testing, alternative access routes and service continuity will be treated as mandatory requirements throughout procurement, implementation and ongoing service management. The EqIA will remain a live document and, should the procurement result in a change of supplier or platform, it will be reviewed once the supplier, solution, service design and implementation arrangements are known.

No.	Final Decision	Tick the relevant box	Include any explanation / justification required
1	No barriers identified; therefore, activity will proceed	-	-
2	Stop at some point because the data shows bias towards one or more groups	-	-
3	Adapt or change the event in a way which you think will eliminate the bias	✓	Potential accessibility, digital exclusion, language, confidentiality and service continuity barriers have been identified. The programme will proceed with adaptations and controls intended to eliminate or reduce these risks. These include mandatory WCAG 2.2 AA requirements, accessible and mobile-friendly design, appropriate assisted and non-digital routes, privacy and access controls, service continuity planning, and ongoing monitoring. The EqlA will be reviewed at each decision and implementation stage.
4	Barriers and impact have been identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (for example, in extreme cases or where positive action is taken). Therefore, proceed with caution with this knowing that it may favour some people less than others, providing justification for this decision	-	-

Section four – record keeping

Question	Response
Will this EqIA be published (EqIA's should be published alongside relevant event paperwork including cabinet papers)	Yes. This EqIA will be published via the Council's Publication Scheme .
Date completed	17 August 2026
Review date (if applicable)	• Before final approval and award of the interim continuity arrangement • After any interim supplier selection requiring implementation or data migration • When implementation, data migration and cutover arrangements are confirmed • Before go-live • Between three and six months after go-live • Annually through ongoing service and contract management

Change log

Name	Date	Version	Change made
Daryl Summers	27 February 2026	0.1	Initial draft completed for procurement governance review.
Brooke Bindon	3 March 2026	0.2	Reviewed draft and made amendments.
Daryl Summers	23 July 2026	0.3	Updated to reflect the interim continuity requirement, potential implementation and data migration impacts, additional equality evidence, monitoring responsibilities and revised final decision.
Daryl Summers	17 August 2026	0.4	Minor revisions made based on feedback received from those involved in the consideration of impact.

Responsibilities

Question	Response	Date completed
Name of person leading this EqIA	Daryl Summers, Web Content Manager	17 August 2026

Question	Response
Names and roles of people involved in the consideration of impact	• Sam Starling, Head of Digital, Data and AI • Brooke Bindon, Senior Business Analyst • Daryl Summers, Web Content Manager

Question	Response	Date signed
Name of Director signing EqIA	Ed Garcez, Chief Digital and Information Officer (interim)	17 August 2026