



## Equality Impact Assessment form

Directorate	Chief Executive's
Service area	Customer Management
Proposal	To no longer stock a supply of RADAR keys for members of the public at the Council House
Reason for proposal	Increased costs of purchasing, changing trends. Availability of RADAR keys from several other sources and in common with many other Councils who have also stopped supplying them to members of the public.
Sign off (Director/Head of Service)	Jane Witherow, Head of Service
Date of assessment	12/09/25

**Please read the support notes to help you in [Appendix 1 on page 5](#) before completing your assessment**

### The form

You need to attach the completed form to any report to help councillors and colleagues make their decisions by taking equality implications into account.

**The assessment team or name of individual completing this form: Phil Campbell**

**Team leader's name and job title:** Phil Campbell – Customer Service Team Leader

Other team members if appropriate

Name	Job title	Organisation	Area of expertise
Ann Webster	Lead on Equality and Diversity	Derby City Council	Equalities

### Step 1 - setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side- tracked.

What are the main aims, objectives, and purpose of the decision you want to make?	The objective is to no longer supply RADAR keys to members of the public.
Why do you need to make this decision?	When the Council first started supplying RADAR Keys it was a very limited market and so we thought it would be easier for disabled people to get keys from us. We also used it as a way that we could make sure that only disabled people could have the keys.

	<p>However, things have moved on over the years and now anyone can get hold of a RADAR key as they are available at a reduced cost from many sources now and there are no checks on who is getting them.</p> <p>In addition, supply costs have increased over recent years. Eligible Derby residents currently receive their first key free from the Council, or £3 for a replacement/additional key. Non-Derby residents are charged £3.</p> <p>At the quantity which we purchase Radar Keys we now pay £3.60 per key (inclusive of VAT and delivery). Other costs of issuing a key to a member of the public include a transaction fee on Civica (cash payments are not supported), admin time and postage costs where applicable. Estimated annual cost to the Council of stocking RADAR keys is £1,400.</p>
Who delivers/will deliver the changed service/policy including any consultation on it and any outside organisations who deliver under procurement arrangements?	Customer Management
Who are the main customers, users, partners, colleagues, or groups affected by this decision?	Residents of Derby who require access to accessible toilets with the RADAR lock on them.

## Step 2 – collecting information and assessing impact

Who have you consulted and engaged with so far about this change, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.	<p>Ann Webster, our Lead on Equality and Diversity raised the proposal at the Council's Access, Equality and Inclusion Hub. Feedback from disabled people on the group was that they would not object to the proposal as they felt RADAR keys are readily available to purchase elsewhere, often at cheaper rates.</p> <p>Phil Campbell Customer Services Team Leader contacted other Councils to check if they offer RADAR keys and at what cost to the public. Thirty Councils responded. Fifteen did not offer RADAR keys at all. Only 2 offered keys free of charge. The ones which did charge set a variety of prices, with an average of £4.50 per key.</p>
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Using the skills and knowledge in your assessment team or what you know yourself, and from any consultation you have done, what do you already know about the equality impact of the proposed change on particular groups? Also, use any other information you know about such as any customer feedback,

surveys, national research, or data. Note that this template now includes Socio-Economic Duty (SED) local data can be found in the [Corporate Insight Report Library](#). Indicate by a 'yes' or 'no' for each protected characteristic group whether this is a negative or a positive impact. Only fill in the mitigation box if you think the decision will have a negative impact and then you'll need to explain how you are going to lessen the impact.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
<b>Age</b> – older and younger people	Older people are more likely to be impacted by this change as they represent a higher proportion of RADAR key users. However, RADAR keys are available to people of all ages.		Yes	Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.  Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.
<b>Disability</b> – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments	Disabled people would be unable to receive a free RADAR key from the Council.  We also know that some disabled people prefer accessible toilets to be unlocked as some struggle with the key and trying to reach the lock.  Our accessible colleague toilets do not have Radar locks on them, except the Changing Places toilet		Yes	Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.  Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.
<b>Gender Reassignment</b> – people who are going through or have been through gender reassignment. We also voluntarily include trans and those people who don't identify with a particular gender, for example, non-binary, genderfluid, genderqueer, polygender and those who are questioning their gender or non-gendered identity.	We know that the Supreme Court Ruling about the meaning of sex in the Equality Act has caused lots of fear and distress to transpeople as the ruling implies that transpeople cannot use the toilet of their identity even with a Recognition Certificate.  So, where there are no gender-neutral toilets, transpeople have no choice but to use accessible toilets - our Access Hub are in support of this as one group of people discriminated against to another		Yes	Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.  Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				together Café does not have a RADAR lock on it.
<b>Marriage and Civil Partnership</b> – this applies to employment issues only	n/a as this is a service delivery issue			
<b>Pregnancy and maternity</b> – women who are pregnant or who have recently had a baby, including breast feeding mothers	RADAR keys open accessible toilets and not baby changing facilities. This will affect disabled pregnant women		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.</p>
<b>Race</b> – the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community	This will affect Black, Asian and Minority Ethnic disabled people		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.</p>
<b>Religion or belief or none</b> – the effects on religious and cultural communities, customers, and colleagues	This will affect disabled people of all religions and beliefs and none		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				accessible toilet near the Better together Café does not have a RADAR lock on it.
<b>Sex</b> – the effects on both men and women and boys and girls	This will affect disabled people of either sex		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.</p>
<b>Sexual orientation</b> – the effects on lesbians, gay men, bisexuals, pansexual, asexual and those questioning their sexuality	This will affect disabled people in the LGBTQ+ community		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.</p>
<b>Those who experience socio-economic disadvantages</b> – this is not a protected characteristic in law, but the Council has voluntarily adopted it. Please see the notes in Appendix 1 to help you with this section.	Residents experiencing financial hardship would be unable to obtain a key for free. However, the cost of buying one online can be as low as £2.98		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>In addition, the cost of travelling to the Council House can cost more than it is to buy a key from elsewhere</p>

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				Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it
<b>Care experience</b> – this is not a protected characteristic in law, but the Council has voluntarily adopted it. Please see the notes in Appendix 1 to help you with this section.	This will affect disabled care experienced people		Yes	<p>Signposting to alternative providers (such as Disability Rights UK), no proof of disability required and other main street suppliers.</p> <p>Accessible toilet facilities are available in the Council House and those that do have a RADAR lock can be unlocked on request. The accessible toilet near the Better together Café does not have a RADAR lock on it.</p>

**Important** - For any of the equality groups you don't have any information about, then please contact our Lead on Equality and Diversity for help. For help with SED please contact [policyandconsultation@derby.gov.uk](mailto:policyandconsultation@derby.gov.uk). You can also get lots of information on reports completed from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

### Step 3 – deciding on the outcome

What outcome does this assessment mean suggest you take? You might find more than one applies.

<b>Outcome 1</b>		<b>No major change needed</b> – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
<b>Outcome 2</b>		<b>Adjust the proposal</b> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
<b>Outcome 3</b>	<b>X</b>	<p><b>Continue the proposal</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:</p> <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> </ul>

		<ul style="list-style-type: none"> <li>plans to monitor the actual impact.</li> </ul>
<b>Outcome 4</b>		<b>Stop and rethink</b> the proposal when the EIA shows actual or potential unlawful discrimination

### Why did you come to this decision?

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the proposal. You also need to make sure that there are actions in the Mitigation Box to lessen the effect of the negative impact. This is so important and may face a legal challenge in the future.

**Removing the supply of RADAR keys brings DCC in-line with other local authorities. Other options considered were removing the free option and charging a higher rate for all keys issued. However, given the fact that keys are readily available to the general public now and at a reasonable price and widely used it is felt that the Council no longer needs to provide this service. Things have moved on since we first started supplying these keys and we have the backing of our Access, Equality and Inclusion Hub.**

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is so important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

## Appendix 1

### Equality impact assessment form– please read this section first before you do the assessment

This is our equality impact assessment form to help your equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact, you need to do an equality impact assessment whenever a decision is needed about our services and functions that affects people and **before** that decision is made.

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities, and procedures.

Policies will usually fall into three main categories:

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures.
- Key decisions such as allocating funding to voluntary organisations, budget setting.
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes, we still need to complete them. The Government’s Equalities Unit has just released some new guidance on the [Public Sector Equality Duty](#) and completing Equality Impact Assessments.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have ‘**due regard**’ to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a ‘**relevant protected characteristic**’ and people who don’t. The nine protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex and sexual orientation.

Having ‘due regard’ means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.



## **Assessing Socio-Economic Duty (SED) as part of the EIA**

The Council agreed to voluntarily implement the Socio-Economic Duty alongside our Public Sector Equality Duty categories in May 2022.

We have added a section to this impact assessment template on the Socio-Economic Duty to make sure we actively consider how our decisions can contribute to reducing inequalities resulting from socio-economic disadvantage.

Areas to actively consider in the decision-making process when assessing the SED include thinking about:

- what are the
- intended aims and/or outcomes of the policy or decision being made?
- whether the assessment of the duty taking place is through all stages of development?
- whether there a particular socio-economic impact for certain groups?
- how people in communities can have an active say in the decision-making process
- whether the policy/decision actively can contribute to reducing inequality outcomes?
- considering how you can engage with people with lived experience of SED?
- collecting and actively considering evidence and stories of residents' lived experiences in implementing the SED. You can get more information on the [corporate insight](#) pages on SharePoint.

When you consider the SED you need to identify if the decision requires analysis of socio-economic factors such as:

- people who live in deprived areas
- households with low income
- people who are in low paid employment
- people who are homeless or are at risk of homelessness
- people who face barriers to employment such as low levels of educational attainment
- people who are or have been care experienced
- people who care for others
- people who face multiple deprivation through a combination of these factors

## **Assessing Care Experience as part of the EIA**

The Council agreed to voluntarily adopt Care Experience as part of our Public Sector Equality Duty categories in September 2024.

Care experience refers to the experiences of individuals who spent part of their childhood in the care system due to situations beyond their control. These individuals can face both direct and indirect discrimination throughout their lives.

A care leaver is defined in law as someone over the age of 16 who has been in the care of the local authority and/or Health and Social Care Trust for a period of at least 13 weeks or more. This definition may present additional barriers for children and young people to access support due to not having a 'typical' journey throughout their time in the care system. As such, the less restrictive 'care experience' definition is preferred which does not exclude individuals based on placement type and duration of time in care.

We have added a section to this impact assessment template on care experience to make sure we actively consider how our decisions can contribute to reducing inequalities facing care experienced people.

Care-experienced individuals are disadvantaged due to biases against them. It is important to detail potential long-term effects and challenges care experience can have on individuals' lives. This could include mental health issues, social stigmas, financial struggles, and more.

Here are some examples of the disadvantages care experienced people face to help you with this assessment:

- **Lack of trust**

Care experienced individuals may have a deep-rooted mistrust in systems or institutions, born out of their experiences with the care system. This could result in hesitancy or difficulty in seeking out and accessing necessary services, leading to delays in receiving important support or care.

- **Social Networks**

Social networks often play a vital role in an individual's ability to access services or support. They can provide valuable information, resources, and emotional support. Care experienced individuals might lack these networks due to broken family relationships or frequent relocations. This can make navigating systems more challenging and isolating.

- **Family guidance**

Individuals who have grown up in care often lack the family guidance and positive adult role models that many take for granted. This could be advice on filling out forms, understanding services available to them, or having the support of a family member when facing an intimidating process. The absence of this support can hinder their ability to access and navigate services.

- **Digital connectivity**

In our increasingly digital world, access to technology and the internet is crucial for accessing many services. Care experienced individuals might face digital exclusion due to lack of financial resources or guidance on how to use digital tools. This can create additional barriers to accessing services, opportunities, and information.

- **Social mobility**

Care experienced individuals can face significant challenges when it comes to social mobility. The hurdles they encounter in education, employment, housing, and other key areas can limit their ability to advance socially and economically. This lack of social mobility can create a vicious cycle that hinders access to services and opportunities.

- **Access to public transport**

Mobility is a key factor in being able to access services. Limited access to reliable and affordable public transport can greatly impede the ability of care-experienced individuals to reach physical service locations. This barrier can be compounded if they are in a situation where they are frequently moved between placements or are in a rural area with limited transport options.

- **Access to housing**

Care experienced individuals aged 18, 19 and 20 have automatic priority to housing – provided by the Local Authority – similar as when they were 16 or 17. However, when searching for accommodation out-of-area, particularly for those progressing to university, students who are care leavers or estranged from their families often struggle to find a suitable rent guarantor, which has become a standard ask from private landlords housing students. Without a guarantor or an upfront payment of 6 to 12 months of rent to secure accommodation, many care experienced young people will be unable to confirm their accommodation. For students, this may mean them dropping out of university

Each of these factors can contribute to the marginalization of care-experienced individuals, making it more difficult for them to access and benefit from services that are crucial to their well-being and development. Understanding these implications is critical to ensuring the EIA process effectively considers the unique challenges faced by those with care experience.

## **Good practice**

A critical part of an EIA is evidence and consultation, which should be reviewed throughout a project. By identifying the proportion of care experienced individuals who access their services, we can get a more accurate understanding of the reach and impact of our initiatives. Higher rates of care-experienced individuals within a service may indicate a particular relevance or need and lower rates may suggest accessibility issues or gaps in service provision.

## **Engaging with care experienced people**

Engaging care experienced people in the policy and service development process can be highly beneficial. It's crucial that we look beyond our services to focus on where referrals come from and are those policies taking account of the care experience?

Derby has a Care Experienced Forum which takes place systematically where new ideas, changes and policies are discussed with those who have care experience to gain their views on how ideas, changes and policies would work in practice from their unique lived experience viewpoint.

Consultation on changes can be taken to the forum by the Leaving Care Service team managers who oversee this, alternatively, a wider consultation can be arranged using Let's Talk Derby so that as broad a range of views of those with care experience can be gathered and inform decision making/changes that impact on the lives of those with care experience.

### **What next after you've completed the form?**

This completed form should be attached to any Corporate Leadership, Cabinet or Personnel Committee report to help decision makers take the equality implications into account when they make the decision. Equality impact assessments **must be done before** decisions are made.

You'll find that completing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

It's best to get a small team together to complete the form as the more knowledge around the table the better. Make sure you include key people in the team such as representatives from our Equality Hubs and Forums and employee networks and you could invite trade union representatives too. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

Remember, we need to complete these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010 and Public Sector Equality Duty. If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and must be easy to understand.

### **Contact for help**

Ann Webster – Lead on Equality and Diversity

[ann.webster@derby.gov.uk](mailto:ann.webster@derby.gov.uk)

Tel 01332 643722 mobile 07812301144 Relay UK 18001 01332 643722

[Sign Language Service](#)

Jenny Wizzard – Policy and External Affairs Officer (for EIA Socio Economic Duty queries)

[Jenny.Wizzard@derby.gov.uk](mailto:Jenny.Wizzard@derby.gov.uk)

Tel 01332 643470 Relay UK 18001 01332 643470

[Sign Language Service](#)

[Jess.Hession@derby.gov.uk](mailto:Jess.Hession@derby.gov.uk) or [HelenO'Kane@derby.gov.uk](mailto:HelenO'Kane@derby.gov.uk) for EIA care experience queries

We can give you this information in any other way, style or language that will help you access it. Please contact us on **01332 643722, 07812301144** or **derby.gov.uk/signing-service/**

#### **Punjabi**

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਇੱਥੇ ਸੰਪਰਕ ਕਰੋ: **01332 64XXXX** ਜਾਂ **derby.gov.uk/signing-service/**

#### **Polish**

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku. Prosimy o kontakt: **01332 64XXXX** lub **derby.gov.uk/signing-service/**

#### **Slovak**

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Prosím, kontaktujte nás na tel. č.: **01332 64XXXX** alebo na stránke **derby.gov.uk/signing-service/**

#### **Urdu**

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 640000** یا **derby.gov.uk/signing-service/** پر ہم سے رابطہ کریں