

Cheltenham Borough Council

Cabinet – 17 March 2026

Equality, Diversity and Inclusion Policy

Accountable member:

Councillor Rowena Hay, Leader of the Council

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Ward(s) affected:

all

Key Decision: No

Executive summary:

This report seeks Cabinet approval of the Cheltenham Borough Council Equality, Diversity and Inclusion (EDI) Policy (2026). The policy outlines the Council's strategic commitment to promoting equality, embracing diversity and fostering inclusion across service delivery, employment, housing, partnerships and community leadership.

The policy replaces the previous equality framework and aligns the Council's approach with:

- Equality Act 2010 and the Public Sector Equality Duty (PSED)
- Best practice in local government, including the Local Government Association's Equality Framework for Local Government
- The Council's corporate priorities and ambition to be a more inclusive employer, landlord and service provider
- The council's decision to voluntarily adopt the socio-economic duty (Equality Act 2010, Part 1) in local practice

Adopting the EDI Policy provides a clear corporate framework, expectations for staff and partners, and a governance and accountability structure to ensure equality considerations are embedded in all decisions, policies and services.

Recommendations: That Cabinet:

- 1. approves the Equality, Diversity and Inclusion (EDI) Policy 2026, attached as Appendix 3.**
- 2. delegates authority to the Director of Governance, Housing and Communities, in consultation with the Leader, to make any minor amendments to the policy as required following implementation.**

1. Implications

1.1 Financial, Property and Asset implications

There are no direct financial implications arising from approval of the policy. Delivery of the EDI Action Plan will be managed within existing budgets, with any additional resource requirements brought forward separately.

Signed off by: Jon Whitlock, Head of Finance (Deputy s151 Officer)
jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

Adopting the policy strengthens the Council's compliance with:

- Equality Act 2010
- Public Sector Equality Duty
- Duties relating to service accessibility and employment

It also creates a clear framework to evidence "due regard" in decision-making through equality impact assessments.

Signed off by: Claire Hughes, Monitoring Officer claire.hughes@cheltenham.gov.uk

1.3 Environmental and climate change implications

There are no direct climate implications. However, inclusive engagement supports fair access to climate and sustainability initiatives.

Signed off by: Maizy McCann, Climate Officer maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Securing our future
- Quality homes, safe and strong communities
- Reducing inequalities, supporting better outcomes

1.5 Equality, Diversity and Inclusion Implications

An equalities impact assessment has been completed and is attached

2 Background

2.1 Cheltenham Borough Council has a long-standing commitment to fairness, equality and community cohesion. The borough's population continues to diversify, and the Council delivers services to a wide range of residents, tenants, visitors and businesses.

2.2 The updated EDI Policy has been developed to:

- Provide a coherent corporate approach to equality and inclusion
- Strengthen compliance with the Public Sector Equality Duty
- Reflect best practice and national guidance
- Support the Council's role as a housing provider, employer, commissioner and community leader
- Embed equality analysis in decision-making and service design
- Promote respect, dignity and fair access across all interactions with the Council

2.3 The policy supports the council's ambition to be a fair, inclusive and compassionate organisation, addressing barriers experienced by communities, including those with protected characteristics, lower socio-economic status, or who are seldom heard.

3 Summary of the EDI Policy

The policy sets out

3.1 Commitment and guiding principles

The Council commits to:

- Equal outcomes
- Dignity and respect
- Celebrating diversity
- Creating inclusive environments
- Meeting the needs of protected groups
- Tackling discrimination, harassment and victimisation

3.2 Statutory responsibilities

The Council will:

- Comply with the Equality Act 2010
- Meet the Public Sector Equality Duty
- Apply the socio-economic duty in local decision-making (voluntary adoption)
- Uphold its Armed Forces Covenant commitment

3.3 Approach to EDI

The Council will

- Embed EDI in all services, policies, workforce practices and procurement
- Regularly assess and monitor the impact of decisions
- Deliver inclusive housing services
- Provide accessible information and services
- Work with partners to improve outcomes
- Promote a respectful culture and challenge discrimination

4 Reasons for recommendations

4.1 Approval of this policy will provide the council with a clear, modern, legally compliant framework for promoting equality and inclusion

5 Alternative options considered

5.1 Cabinet council decide not to approve this policy. However, this is not recommended as doing so would compromise the Council's

- compliance with statutory duties
- ability to embed equality in decision-making
- alignment with best practice
- clarity for employees, residents and partner organisation

6 Key risks

6.1 See risk assessment at appendix 1

Report author:

Claire Hughes, Director of Governance, Housing and Communities

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment
- iii. EDI Policy

Background information:

None

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	Without an EDI policy the council risks being in breach of its legal obligations under the Equality Act and Public Sector Equality Duty	Director of Governance, Housing and Communities	4	1	4	Accept	Ensure adoption and implementation of policy		
2	If there is inconsistent implementation of the policy across service areas there is a risk of unequal experiences for residents and employees	Safeguarding and EDI Manager	3	3	9	Reduce	<ul style="list-style-type: none"> • Annual EDI Action Plan with clear service-level responsibilities • EDI Advocates supporting each service • Mandatory EDI training for all staff and councillors • Leadership Team oversight and regular reporting 	Safeguarding and EDI Manager	

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3	If there is a lack of staff capability of confidence to apply EDI principles then they may not be able to apply inclusive practices	Safeguarding and EDI Manager	3	3	9	Reduce	<ul style="list-style-type: none"> • Comprehensive EDI training programme • Specialist training for high-risk areas (housing, customer contact, enforcement) • Updated HR policies and guidance • Clear escalation routes for concern 	Safeguarding and EDI Manager	
4	Failure to complete meaningful equality impact assessments or apply the Public Sector Equality Duty could result in legal challenge	Director of Governance, Housing and Communities	4	2	8	Accept	Ensure EQIAs are completed and considered as part of decision making		

Appendix 2: Equality Impact Assessment (Screening)

1. Identify the policy, project, function or service change

a. Person responsible for this Equality Impact Assessment

Officer responsible: Claire Hughes	Service Area:
Title: Director of Governance, Housing and Communities	Date of assessment: 27 February 2026
Signature: C.Hughes	

b. Is this a policy, function, strategy, service change or project?

Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Equality, Diversity and Inclusion Policy

Is this new or existing?

Is changing

Please specify reason for change or development of policy, function, strategy, service change or project

Updated to reflect transition of Housing Services and best practice

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:

The Equality, Diversity and Inclusion (EDI) Policy sets out Cheltenham Borough Council's commitment to:

- Complying with the Equality Act 2010 and the Public Sector Equality Duty
- Advancing equality of opportunity
- Tackling discrimination, harassment and victimisation
- Promoting inclusion in services, employment, housing and community leadership
- Improving access to services and reducing disadvantage
- Voluntarily adopting the socio-economic duty in local practice

- Embed EDI across all council functions
- Comply with statutory duties

Objectives:	<ul style="list-style-type: none"> • Promote fair access to services, housing and employment • Tackle discrimination, harassment and victimisation • Strengthen an inclusive and respectful culture • Use data and equality analysis to make fair decisions • Foster strong community relations • Ensure transparent governance and accountability
Outcomes:	<ul style="list-style-type: none"> • A more inclusive and equitable organisation • Services that better meet the needs of diverse communities • Reduced inequality and discrimination • Fair and transparent decision making • Increased community engagement and trust • Safer and more respectful communities • A representative workforce • Clear evidence of progress
Benefits:	<p>For Residents, Tenants and Service Users</p> <ul style="list-style-type: none"> • Fairer access to services and housing • Improved accessibility and reasonable adjustments • More respectful interactions with staff • Tailored support for vulnerable groups (e.g., disabled people, refugees, survivors of domestic abuse) • Greater involvement in decisions affecting their homes and communities <p>For Employees</p> <ul style="list-style-type: none"> • A more inclusive workplace culture • Fair recruitment, training and progression opportunities • Better support for disability, health conditions, maternity, and caring responsibilities • Protection from discrimination and harassment <p>For the Council</p> <ul style="list-style-type: none"> • Stronger compliance with legal duties and reduced risk of challenge • Better decision-making supported by data and equality analysis • Improved community relationships and trust • More effective service delivery and better outcomes • Stronger partnership working across Cheltenham • Enhanced reputation as an inclusive employer and community leader <p>For Partners and Contractors</p> <ul style="list-style-type: none"> • Clear expectations for equality standards • Stronger consistency in public service delivery across Cheltenham

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	Yes
Do you expect the impacts to be positive or negative?	Positive
Please provide an explanation for your answer:	
This policy is designed to ensure positive impacts on protected characteristics	

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	Yes
Owner of Stage Two assessment	Claire Hughes
Completion date for Stage Two assessment	27 February 2026

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

This assessment draw on:

- Workforce equality data
- Local demographic information (e.g. Inform Gloucestershire)
- Feedback from tenants, communities and service users
- Consultation with service leads, HR, and EDI Advocates
- Evidence from complaints, safeguarding, hate crime reporting and customer insight

b. Consultation

Has any consultation be conducted?

Yes

Describe the consultation or engagement you have conducted or are intending to conduct.

Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

Scrutiny committee, relevant staff and members

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
	Younger People (16-25)	Positive	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
	Children (0-16)	Positive	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
DISABILITY A definition of disability under the Equality Act 2010 is available here . <i>See also carer responsibilities under other considerations.</i>	Physical disability	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Sensory Impairment (sight, hearing)	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Mental health	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Learning Disability	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	

GENDER REASSIGNMENT		Positive	Explicit focus on respect, pronouns, tackling harassment, inclusive communication	
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	Neutral impact; policy promotes fair treatment	
	Men	Neutral	Neutral impact; policy promotes fair treatment	
	Lesbians	Neutral	Neutral impact; policy promotes fair treatment	
	Gay Men	Neutral	Neutral impact; policy promotes fair treatment	
PREGNANCY & MATERNITY	Women	Positive	Commitment to fair employment practices, accessible housing and safeguarding	
RACE* Further information on the breakdown below each of these headings, is available here . For example Asian, includes Chinese,	White	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Mixed or multiple ethnic groups	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Asian	Positive	Commitments to tackling discrimination,	

Pakistani and Indian etc			hate crime, using accessible language, working with community partners	
	African	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Caribbean or Black	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
		Choose an item.		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Positive	Focus on respect, tackling harassment, promoting cohesion	
SEX (GENDER)	Men	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
	Women	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
	Trans Men	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	

	Trans Women	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
SEXUAL ORIENTATION	Heterosexual	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Lesbian	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Gay	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Bisexual/Pansexual	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Positive	Voluntary adoption of the socio-economic duty; support through advice, benefits and community programmes	
Rurality i.e. access to services; transport; education; employment;		Neutral		

broadband				
Other (e.g. caring responsibilities)	Armed Force Community	Positive	Commitment under the Covenant to ensure fair access	
	Carers	Positive	Accessible information, reasonable adjustments and inclusive services	
	Seldom heard groups	Positive	Clear focus on targeted engagement; community development programmes explicitly designed for inclusion	

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
Develop and Implement EDI action plan	Ongoing	Safeguarding and EDI Manager
Corporate training for staff and councillors	September 2026	Safeguarding and EDI Manager
Improve data collections and transparency	Ongoing	Safeguarding and EDI Manager
Continue targeted engagement	Ongoing	Safeguarding and EDI Manager

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change
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