
Equality Impact Assessment of the proposed Devon and Torbay Combined County Authority and Devolution Deal

Service: Performance and Partnerships, Devon County Council

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On behalf of Devon County Council and Torbay Council

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This is an equality impact assessment of the proposal for the Devon and Torbay Combined
County Authority (DT CCA) and associated devolution deal.

1. Introduction and Background

Devon, Plymouth and Torbay was one of nine areas invited by Government, as part of the February 2022 Levelling Up White Paper, to agree a devolution deal. The [proposed devolution deal for Devon and Torbay](#) was published by the Department for Levelling Up, Housing and Communities (DLUHC) on 25 January 2024¹.

The proposed deal includes commitments to:

- The formation of the Devon and Torbay Combined County Authority (DT CCA) including the creation of a leadership group led by a nominated chair, to provide overall vision and leadership, seek the best value for taxpayer's money, and be accountable to residents.
- New powers to better shape local skills provisions to ensure these meet the needs of the local economy. This will include devolution of Adult Education functions and the core Adult Education Budget, Funding for Free Courses for Jobs, and the opportunity to provide input into Local Skills Improvement Plans.
- £16 million of new capital funding in the current Spending Review period (i.e. to March 2025) to support the delivery of local housing priorities, drive Net Zero ambitions and support green skills capacity, and accelerate wider low carbon business transition across the Devon and Torbay area. This investment is subject to agreement of business cases.
- Greater collaboration between the DT CCA and Homes England to reduce the barriers to affordable housing delivery, regeneration and housing growth – with a particular focus on rural and coastal communities. By combining skills and capacity, the DT CCA and Homes England will develop a shared development pipeline, underpinned by a clear action plan, and explore ways to support the delivery of that pipeline via current and future national housing programmes.
- Agreement from Government to discuss the recommendations of the Devon Housing Commission.
- New powers to improve and better integrate local transport, including the ability to introduce bus franchising subject to approval from the Secretary of State for transport, and control of appropriate local transport functions e.g. responsibility for an area-wide local transport plan.
- Subject to funding, policy and delivery considerations at the next Spending Review, UK Shared Prosperity Fund (UKSPF) planning and delivery at a strategic level from 2025/26. In carrying out this role, the DT CCA will engage all district councils and other local partners to ensure that the needs of residents can be effectively addressed.

¹ <https://www.gov.uk/government/publications/devon-and-torbay-devolution-deal>

- The integration of the functions of the Heart of the South West Local Enterprise Partnership held by Devon County Council and Torbay Council into the DT CCA, alongside the provision of a strong and independent local business voice which informs local decision making and strategic economic planning.
- A commitment to developing, in partnership with the Government, an arrangement which ensures close cooperation with the Police and Crime Commissioner.
- A clear role for Devon and Torbay in local resilience and civil contingency planning, preparation, and delivery.

Plymouth City Council decided in November 2023 to withdraw from the devolution deal because it would “have seen Plymouth having less power and control over transport in the city, with no commitment to increased resources”². The provisions of the proposed devolution deal enable Plymouth City Council to apply to join the DT CCA at some point in the future should it wish to do so.

The powers and funding described in the deal would be devolved to a separate “body corporate” established by Parliament: the Devon and Torbay Combined County Authority (DT CAA). The members of the DT CCA would comprise elected members of Devon County Council and Torbay Council together with district council elected member representatives and other stakeholders.

The statutory requirements for establishing a Combined County Authority include undertaking a public consultation on a draft proposal. Devon County Council and Torbay Council therefore developed a draft proposal for the DT CCA which set out how it would deliver the responsibilities, powers and functions described in the proposed devolution deal.

On 2 February 2024 the Devon County Council and Torbay Council Cabinets agreed to carry out a joint consultation from 12 February 2024 to 24 March 2024 on the draft proposal. The purpose of the public consultation was to invite views from partners (including district councils), stakeholders and public on why the area is seeking to establish the DT CCA, the benefits it would deliver and how it would operate.

During the consultation period, the Devon County Council Equality Reference Group (alongside representatives of organisations representing those with protected characteristics in Torbay) met to consider the draft proposal and the associated Equality Impact Assessment (EIA). The Group highlighted the need to ensure that a diverse range of voices are heard through the advisory group structure.

² <https://www.plymouth.gov.uk/plymouth-withdraws-proposed-devolution-deal>

This equality impact assessment will be considered by Devon County Council and Torbay Council in April 2024 alongside an analysis of the results of the public consultation on the draft proposal for the DT CCA.

2. Potential equality impacts of the proposal for the Devon and Torbay Combined County Authority

2.1 Overall potential equality impacts

The work of the DT CCA will affect everyone who visits, lives or works in Devon and Torbay. The draft proposal for the DT CCA published on 12 February 2024 included a draft [list of the powers and functions](#)³ that Devon County Council and Torbay Council propose become available to the DT CCA.

The decisions made by the DT CCA once it is established could result in different impacts on different communities/protected characteristics. Under its Public Sector Equality Duties, the DT CCA is required to give 'due regard' to equality. To fulfil these duties it must understand what those impacts might be and put in place mitigation measures to limit any adverse impacts where appropriate. It would need to ensure that due consideration is given to potential equality impacts when making decisions and allocating resources.

As an example, the powers and functions of the DT CCA would have the potential to improve access to adult education which can have a fundamental impact on peoples' life chances. Access to adult education is vital to support social mobility, entrepreneurship and career progression. It enables residents, particularly those who experience the greatest barriers, to access the education they require to build the lives they want to lead and fulfil their potential. This is especially true for people with protected characteristics – particularly people from ethnic minority groups, disabled people, women, and older people. Younger people in Devon and Torbay– and people with many other protected characteristics – cite access to career opportunities as an important priority. Funding made available to the DT CCA would provide an opportunity to increase higher paid jobs and retain talent in Devon and Torbay, to create a place where everyone can see a positive future, where they want to stay, live and work.

The DT CCA would have opportunities to empower all residents including those with protected characteristics to influence decision making. The devolved funding and decision making could lay the foundations to enable service planning and strategy to better respond to communities' needs. This would allow more locally focused solutions to priorities and planning that is led and driven at a local level.

Health and wellbeing outcomes in Devon and Torbay are strongly linked to poverty and social context. The DT CCA should, in its decision making, consider the impacts of poverty and social context on those with protected characteristics. For instance, disabled people, unpaid carers, Black, Asian and minority ethnic groups, and people who identify as Lesbian,

³ <https://www.devontorbaydeal.org.uk/table-of-powers-functions/>

Gay, Bisexual and Transgender (LGBT+) typically experience poorer health. A significant proportion of the people in Devon and Torbay have below-average incomes and above-average housing costs. This makes them particularly vulnerable to increases in the cost of living. There are substantial inequalities in social mobility across Devon and Torbay. The Social Mobility [Commission's Social Mobility Index Social Mobility in the South West Report](#) shows the variation in the chances that a child from a disadvantaged background will do well at school and get a good job compared to their more socioeconomically advantaged peers.

2.2 Protected characteristic: age

The DT CCA has the potential for positive impacts on people of all ages in traditional forms of employment. Investment in the local economy, in skills and retraining will enhance qualification levels, access and suitability for employment, resulting in a workforce with the right skills for the area to be economically competitive and, in turn, attract more investment.

Improving transport and connectivity benefits many communities and can be crucial to enable people to travel for work, education and to access services.

No specific decisions have yet been made about where investment will occur to generate employment opportunities and/or improve skills. The DT CCA would need to establish mechanisms for considering and ensuring that investment is distributed to best effect.

In relation to the proposed new powers to shape skills provision, younger people as well as older workers and those seeking to access employment for the first time, or returning to work following a period of inactivity will benefit from the investment in upskilling which will enhance qualification levels and in turn strengthen access to and suitability for employment.

There are significant variations in educational attainment within the area. For working age people the percentage achieving NVQ Level 4 qualifications in the area as a whole is 43% (Dec 2022), whilst the national average is 51% (Dec 2022). Being able to plan and deliver to boost adult education and skills training locally should advance equality of opportunity.

The proportion of children in Devon and Torbay achieving a 'good level of development' at the end of reception has not improved at the same pace as improvements seen nationally and is even lower for those in receipt of free school meals.

In relation to transport, the opportunity to develop a single local transport plan for the whole area will ensure a better connected and accessible public transport system, with

infrastructure that links opportunities to need and travel choices that are safe, inclusive, affordable and low carbon.

The potential to improve transport and connectivity is beneficial to people of all ages. It is extremely important to those of working age to enable them to better access employment, but also beneficial to those in education and higher education as well as people who need to access public services. This can include both younger and older people.

It is not envisaged that the proposal would have negative impacts for individuals with this protected characteristic.

2.3 Protected characteristic: disability

The potential for disabled people to be subject to greater discrimination when seeking to access employment or training is recognised. The proposal may lead to improvements if powers that are proposed to be afforded to the DT CCA are exercised in a way that focusses on removing barriers to employment and training for disabled people.

Improvements in transport across the area is anticipated to benefit disabled people, as we know that disabled people are less likely to hold a driving licence and thus have access to their own vehicle when compared to people who do not have a disability. This provides the potential for greater accessibility to education, employment and other services to a group of people who traditionally might face greater challenges in this regard. This can lead to a reduction in isolation or exclusion of disabled people, as well as opening up new opportunities.

The DT CCA will have opportunities to integrate disability access considerations into core growth, infrastructure, transport, development and regeneration projects – accelerating progress on access for disabled and older people and in turn address persistent barriers to participation. Accessibility of the built environment and transport is highlighted as one of the top priorities to achieve disability equality.

The supply of accessible housing for disabled people remains limited. Specially built or adapted housing can be more expensive, whilst many disabled people may have lower incomes or fewer resources with which to afford this more expensive housing. Within the proposals, any opportunities to increase the supply of affordable and rented accessible housing could have an important positive impact for disabled people and carers.

It is not envisaged that the proposal would have negative impacts for individuals with this protected characteristic.

2.4 Protected characteristic: race and culture

It is recognised that some people suffer discrimination, disadvantage, or additional barriers in accessing education, employment and other services as a result of their race or ethnic

origin. Different communities can experience different levels of such discrimination, disadvantage or additional barriers.

The DT CCA will have the potential to offer improved opportunities to people from the different communities which make up the area's population. This is especially the case with the proposals around employment and skills, support to businesses and investment. The DT CCA could also provide support to people seeking to expand or improve their skills and qualifications, and thus progress or improve their earnings potential.

The potential to exercise functions relating to skills and education has the potential to improve employment prospects of individuals from Black, Asian and minority ethnic groups. Improvements in transport across the area can assist in enabling those from disadvantaged communities to overcome impacts arising due to their geographical location as data shows that people from Black, Asian and minority ethnic groups are less likely to less likely to hold a driving licence and thus have access to their own vehicle when compared to people who identify their ethnicity as white. The potential for greater investment into the area will also provide the opportunity for investing in a way that improves the prospects of individuals from disadvantaged communities, whether by encouraging the location or relocation of operations to appropriate areas by employers or otherwise better enabling individuals to access employers where currently located.

It is not envisaged that the proposal would have negative impacts for individuals with this protected characteristic.

2.5 Protected characteristic: care leavers

Both Devon County Council and Torbay Council have agreed to treat care experience as if it were a Protected Characteristic, recognising the additional barriers that people who have experience of the care system face.

The DT CCA has the potential for positive impacts around employment and skills for many residents including those with care experience who often face additional barriers when accessing education and employment. Investment in the local economy, in skills and retraining will enhance qualification levels, access and suitability for employment. The ambition is a workforce that has the right skills for the area to be economically competitive and, in turn attract more investment. Improving transport and connectivity will benefit many communities and can be crucial to enable people to travel for work, education and to access services.

The DT CCA will have an important role in helping to create opportunities for care leavers in education, in employment and training opportunities, in housing and accommodation.

2.6 Protected characteristic: sex, sexual orientation and gender identity and reassignment

The DT CCA has the potential for positive impacts around employment and skills for people of all genders. Investment in the local economy, in skills and retraining will enhance qualification levels, access and suitability for employment. The ambition is a workforce that has the right skills for the area to be economically competitive and, in turn attract more investment. Improving transport and connectivity will benefit many communities and can be crucial to enable people to travel for work, education and to access services.

It is widely acknowledged that females face increased barriers to accessing the job market in comparison to males. In September 2023, 80% of males aged 16-64 in Devon and Torbay were in employment compared to 76% of females. 42% of females were employed in part-time work, compared to 14% of males. In addition, the median full time weekly wage for full time male workers in Devon and Torbay is £654. It is nearly 15% lower at £559 for females.

The factors contributing to this picture are complicated with this likely due to a combination of factors, including the increased likelihood of females having caring responsibilities which can act as a barrier to the labour market.

The proposed devolution deal has the potential to address inequalities in employment opportunities including contributing to addressing the gender pay gap. The success of the DT CCA in addressing these issues would depend on more detailed plans and decisions made around skills investment and training, how women are supported into employment and older men to retrain.

LGBT+ and transgender employees are more likely to experience workplace conflict and harassment than their heterosexual, cisgender counterparts. The DT CCA will have the opportunity to support employers in creating working environments that meets the needs of all employees. Employers must ensure that sexual orientation and gender identity should do not affect whether they get a job, benefit from training or get promoted.

2.7 Other protected characteristics

It is not anticipated that the proposal for the DT CCA will have any impacts on people on the grounds of religion and belief.

3 The Devon and Torbay Combined County Authority's governance arrangements

The DT CCA will be required to have an Overview and Scrutiny Committee to ensure that the CCA's decision-making is focussed on community needs and that it provides value for money. The political balance of that committee will reflect that of Devon County Council and Torbay Council. However, the chair and vice-chair will not be members of the same political party as their respective Lead Member on the CCA.

At the moment this EIA is very high level due to the broad range of powers that are being considered as part of the proposed development of the DT CAA and therefore it is difficult to know the specific equality impacts that may be felt. However, if the proposed DT CAA is established, equality impact assessments will be undertaken at the design stage of all investment, strategic planning and commissioning decisions. This would enable equality impacts to be assessed and taken into account.

The DT CAA should consider how to ensure that its membership, including its committees and advisory groups, are as inclusive as possible. The DT CCA should consider appointing a dedicated Diversity Champion: a member with a specific role for ensuring equality and diversity is at the heart of Combined County Authority decision making. It is important that equality considerations are also mainstreamed into the advisory groups alongside having standalone arrangements.

It is currently proposed that the DT CCA would establish advisory groups for:

- Business and Growth – the business voice
- Skills and Employment
- Housing
- Environment/Net Zero
- Investment

For transport, the existing arrangements between Devon County Council and Torbay Council would be developed and strengthened.

4 Description of consultation process and outcomes

A draft version of this equality impact assessment was considered by Devon County Council and Torbay Council on 2 February 2024 when they agreed to carry out the public consultation on the draft proposal for the DT CCA.

This is the final version of the equality impact assessment which will be considered by Devon County Council and Torbay Council in April 2024. It has been informed by a specific meeting of the Devon Equality Reference Group (ERG) to discuss the proposed devolution deal. This meeting was also attended by representatives of organisations in Torbay that support the work on equality and diversity by providing advice, feedback, ideas and scrutiny. The usual ERG members are drawn from the voluntary and community sector are independent of the County Council and Service Level Agreements are in place.

Living Options Devon feedback

Living Options Devon (LOD) submitted detailed feedback on the draft proposal which is attached below. LOD is a charity and a company limited by guarantee founded over 30 years ago. It exists to ensure people with disabilities and Deaf people with sign language can make an active and equal contribution in society.

LOD's feedback recognised and recommended that:

"The opportunities for positive and impactful change under these devolution proposals are substantial. For these changes to be equitable and meaningful for the entire population of Devon and Torbay they each need to be proactively and accessibly communicated and then also have accessible means of giving feedback. This again means alternatives to digital must be offered alongside BSL interpretation and EasyRead/alternative language documentation. All of this will ensure that any resulting devolution actions will be inclusive and acknowledge the breadth of lived experience across the county."



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