

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

	Question	Response
1.1	Name of policy	Healthier Food and Drink Advertising Policy

<p>1.2</p>	<p>Summary of aims and objectives of the policy</p>	<p>To revise the current policy for advertising so that it establishes a consistent approach in the Council’s roles in both placing and hosting advertising content. The revised policy establishes a set of standards and framework of controls that will help maximise benefits whilst ensuring compliance with legislation, advertising industry codes, Council policies and guidelines.</p> <p>As part of the systems wide approach to reducing obesity and health inequalities across Swindon, it is proposed that the council adopts the Healthier Food and Drink Advertising Policy. The policy will also constitute a formal addendum to the Council’s Advertising and Sponsorship Policy and would be read and applied in concert with said policy.</p> <p>The alternative approach considered was to not adopt the policy and for the market to regulate itself. However, obesity is a complex problem that requires a comprehensive approach. This policy is one part of a larger effort to address the issue at the local level. There is evidence that exposure to advertisements for unhealthy food and drinks can influence our food choices. These products, which are high in fat, salt, and/or sugar, are often referred to as HFSS products. HFSS products include chocolate and confectionary, cakes and biscuits, puddings and pastries, savoury snacks, fried foods, and sugar-sweetened beverages.</p> <p>A study by Cancer Research UK (2018) found that exposure to HFSS advertising can lead to young people consuming an additional 350 calories per week. The study also found that young people who see these ads daily are more than twice as likely to be obese. Additionally, 87% of young people found HFSS ads appealing, and 75% said they were tempted to eat the product after seeing it advertised.</p> <p>Herforth et al. (2015) define the food environment as: the consumer interface with the food system that encompasses the availability, affordability, convenience, and desirability of foods. The food environment is largely shaped by commercial actors, such as retailers, advertisers, and other economic operations. Therefore, when designing strategies to improve the local food environment, it is important to focus on these actors. Food environments mediate between consumers and producers, translating demand patterns into production signals. As such, marketing regulations can be an important tool for effective change strategies that target the food environment, rather than the individual consumer.</p> <p>Interventions in this area have the potential to be highly effective in reducing obesity and promoting healthy outcomes.</p>
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<p>1.3</p>	<p>Who is affected by the policy?</p>	<p>In Swindon, the latest data from 2022/23 shows that 20.5% of children in reception (age 4-5), 36.8% of children in year 6 (age 10 to 11) and 69.1% of adults are overweight or obese. Swindon’s rates at all ages are higher than both the regional and England values and for year 6 children and adults, Swindon has some of the highest rates of overweight and obesity in the South West region.</p> <p>Excess weight for children can cause negative effects as they grow up but also when they are adults and can result in serious psychological difficulties. Obesity also disproportionately impacts on individuals and families living in more deprived areas and is a major source of inequalities. There has been a significant increase in obesity in the most deprived communities in England in recent years. People in the most deprived areas are also more than twice as likely to be admitted to hospital for obesity-related health problems.</p> <p>In Swindon, there is a clear link between obesity and deprivation with the prevalence of overweight and obesity in reception age children being highest in more deprived wards. Furthermore, national data indicates across all age groups, overweight and obesity disproportionately affects residents identifying as Black, Mixed, Bangladeshi, Indian and Pakistani ethnicity.</p> <p>In Swindon’s most deprived wards, there is a greater concentration of bus routes, which provides a network of public transport options for those who may not drive, however, this also increases the exposure to advertisements of HFSS products via bus shelters. Advertising spaces naturally tend to occupy busier streets so as to catch more attention.</p> <div data-bbox="639 1368 1315 1841"> <p>Deprivation score by ward in Swindon with Bus Routes</p> <p>Legend</p> <p>— Swindon - Bus Routes - V1.0 — Swindon - Bus Routes - V1</p> <p>Deprivation Score</p> <ul style="list-style-type: none"> 6.7 - 9.2 9.2 - 12.8 12.8 - 17.7 17.7 - 24.6 24.6 - 36.9 </div>
<p>1.4</p>	<p>What involvement and consultation has been done in relation to this proposal? (e.g. with</p>	<p>No specific consultation has been conducted with people likely to be affected by the proposal. The justification for this is Sustain, the charity responsible for the guidance document ‘Healthier Food Advertising Toolkit’ note – “local authorities that have been more public before getting sign-off faced far</p>

	<i>relevant groups and stakeholders)</i>	more barriers and industry lobbying”. However, in May 2023, YouGov polling by the Obesity Health Alliance reported that 64% of adults would like their local council to be able to restrict unhealthy food and drink advertising in outdoor areas, with 76% of adults wanting the same restrictions to be in place for areas specifically where children congregate. Therefore, in light of the information available on the health benefits for this policy, the opportunity to minimise barriers to implementation, as well as regional consensus in favour of such a policy, the public were not consulted at this stage.
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Section Two

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 (e.g. adjustment to the proposal)
Disability	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the TfL advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for those living in the most deprived communities.	N/A
Gender Reassignment	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the TfL advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for	N/A

		those living in the most deprived communities.	
Marriage or Civil Partnership	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the Tfl advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for those living in the most deprived communities.	N/A
Pregnancy and Maternity	Positive	97% of snacks marketed towards babies and toddlers feature a nutritional or health claim on the front of the packaging despite often being high in sugar for this age group.	N/A
Race	Positive	Research suggests that ethnic minority groups have a higher likelihood of exposure to food marketing outdoors.	N/A
Religion or Belief	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the Tfl advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for those living in the	N/A

		most deprived communities.	
Sexual Orientation	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the TFL advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for those living in the most deprived communities.	N/A
Sex (gender)	Neutral	No specific negative or positive impact beyond the same benefits experienced by all - Modelling conducted by researchers at the University of Sheffield found the TFL advertising policy reduces obesity and cardiovascular disease in all people, with larger benefits for those living in the most deprived communities.	N/A
Age	Positive	A study by Cancer Research UK (2018) found that exposure to HFSS advertising can lead to young people consuming an additional 350 calories per week. The study also found that young people who see these ads daily are more than twice as likely to be obese. Additionally, 87% of young people found	N/A

		HFSS ads appealing, and 75% said they were tempted to eat the product after seeing it advertised.	
Children in Care and Care Leavers	Positive	As above.	N/A

Section Three

3.1	Potential Barriers to success and mitigating Actions – summary	<ol style="list-style-type: none"> 1. Financial impact arising from a restrictive policy approach to some advertising types - No revenue generated from HFSS product advertisements on Council-owned assets since 2021, indicating low interest in this provision. Current contract with bus shelter (Council-procured assets) does not generate income for the Council, as it is a nil contract for the maintenance, cleaning and installation of bus shelters, however this may change in the re-procurement of this contract. 2. The Council's reputation is damaged by the Policy - Clear explanation of Policy and its Public Health framework approach. Internal and external communication about the Policy. Internal guidance and training on applying the Policy. 3. Insufficient staff time to apply the policy changes - Clear explanation of Policy and its Public Health framework approach. Internal and external communication about the Policy. Internal guidance and training on applying the Policy. Clear agreement between directors of service on how best to deliver this policy. Learning from Bristol City Council adopted to suit local needs so as to avoid previously experienced pitfalls of implementation. 4. Rural bus shelters become unusable due to disrepair - It is already acknowledged bus shelters outside of the arterial routes of Swindon's bus map are falling into disrepair and so the change wouldn't necessarily change this outcome. This policy does not ban any brand, but restricts products that are HFSS and requires any brand wanting to advertise to swap products that adhere to the policy. Therefore, a risk to the reduction in income is low. <p>No changes have been made to the proposals during the course of this EQIA, but it has solidified the thinking in how</p>
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		beneficial this policy will be for protecting children and infants from the harmful impacts of HFSS advertising. In giving Swindon children the best start in life, we may be able to prevent overweight and obesity in adulthood.
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3.2	How will success be measured?	Measuring the success of this policy can be challenging as benefits may not be seen for many years. However, we will measure our progress against prevalence data and indicators in the local obesity profiles as part of the national Public Health Outcomes Frameworks. Additionally, depending on the resource available, we will measure the link between exposure to the advertisements and residents recall to seeing the advertisements. A study has been conducted in Bristol, where we will be able to adopt a similar study protocol.
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3.3	What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event?	A task and finish group comprising of colleagues from Public Health, Transport and Communications will monitor and ensure effective implementation of the policy. Associated actions will be reported to the Swindon Health and Wellbeing Board as part of the Whole Systems Approach to Obesity Strategy.
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Section Four

For the Record			
Name of person leading this EQIA	Lewis Bird	Date Completed	07/08/2023
Names and roles of people involved in the consideration of impact			
Name of Director signing EQIA		Date Signed	xx/xx/xxxx