

HIGH LEVEL EQUALITY IMPACT ASSESSMENT FOR STRATEGIC PROGRAMMES



Programme title	Local Government Reorganisation	Programme start date	February 2025
Team	Strategy	Directorate	Communities and Housing
Officer completing this form	Alia Mekheimar	Officer's role	Strategy Officer
SLT Sponsor	Helen Chamberlin	Role	Head of Strategy, Engagement and Culture
Date assessment commenced	1 April 2025	Date of completion	29 August 2025

Will the report this EqIA relates to go to Committee? If so, which ones and when?

- Full Council: Tuesday 23 September 2025
- Cabinet: Tuesday 23 September 2025



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What are the main aims or purpose of the programme? (Include links to project briefs, cabinet reports etc)

The main purpose of local government reorganisation is to create simpler governance structures that deliver better outcomes for residents, enhance local accountability and achieve efficiency savings that can be reinvested in public services.

The [English Devolution White Paper](#) outlines central Government's plans to replace the current two-tier system of district and county councils with a single tier of local government. This would establish larger, unitary authorities that are responsible for delivering all local government services within an area.

Norwich City Council's key strategic aim within this programme of work is to establish a three-unitary model for Norfolk, as detailed in the [18 March 2025 report to Full Council](#). This model has been assessed against the [criteria set by central government](#) and independently identified as the best option for Norfolk. The case for a three-unitary model for Norfolk also supports a Greater Norwich Unitary being established on extended boundaries, as outlined in '[A case for Greater Norwich – supporting the Interim Plan](#)'.

This EqIA informs and supports the case for Greater Norwich and responds to the needs and concerns of Norwich city residents and stakeholders, including those captured within the expanded Greater Norwich footprint; it also complements the wider three-unitary model for Norfolk, as part of a joined-up examination of resident and stakeholder needs across the county.

How does it fit with other services and policies, and how does it support our [corporate priorities](#)?

Local government reorganisation is part of a wider set of reforms to the local government sector as a whole, which seek to support broad strategic plans set out in the Government's [Plan for Change](#).

These reforms include the below, against which the council's corresponding corporate priorities are discussed (as they appear in our Community-Led Plan: '[We are Norwich](#)' 2024-2029). While any successor council will ultimately create its own corporate priorities that may, or may not, align with those we hold currently, our submission to Government is guided by Norwich City Council (and its county partners) and thus, it is these priorities against which the council should consider this EqIA:

1. **Efficiency and cost savings:** by streamlining local government structures, local government reorganisation aims to reduce duplication of services and achieve economies of scale. This aligns with central Government's objective of improving public sector efficiency and placing councils on a more secure financial footing.

This supports our corporate priority “**an open and modern council**”, particularly its core aims to ensure we are *a council delivering excellence, and a data and insight driven and people focussed council*. By redesigning services and achieving



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efficiencies, the council can better invest in and respond to the diverse needs of its residents and stakeholders, reducing disadvantage and ensuring inclusive and equitable governance.

2. **Improved service delivery:** reorganisation is designed to enhance the quality and accessibility of public services by creating more integrated governance structures which are better tailored to respond to the distinct needs and priorities of local communities.

This supports our corporate priorities “**an open and modern council**” and “**a future-proof Norwich**”, particularly the core aims under our “an open and modern council” priority to ensure we are a *collaborative council, a council delivering excellence, and a council invested in its people*; and – in consideration of our “a future-proof Norwich” priority – that we *enable empowered communities* and support *a city ready for change, equipped for new ways of working and prepared for future challenges*.

By improving the quality and accessibility of our services in this way, we can better serve the specific needs of the Greater Norwich urban area (and the more rural communities within the footprint), promoting participatory governance, working in partnership and collaborating with county agencies to ensure community voices are heard and the needs and concerns of residents and stakeholders are better addressed.

Furthermore, the blueprints for service delivery appearing in the appendices of the report this EqIA supports which focus on this topic but also seek to promote preventative and early intervention strategies, help us to ensure *better health outcomes and longer life expectancy* for Norwich residents, while *tackling the root causes of disadvantage*, two of the aims of our “**a fairer Norwich**” corporate priority.

3. **Clearer accountability:** simplifying local government structures aligns with central Government's aim to increase transparency, accountability and democratic engagement.

This reform aligns directly with the guiding principle within our Community-Led Plan that we will “**listen to the city**”; and our corporate priority “**an open and modern council**” in which we state that we seek to ensure that:

“Our council is regarded as open and transparent. We have high levels of involvement across our voluntary and community sectors, and we share our skills and knowledge across private and public sectors to achieve common goals. We have taken a partnership approach to city leadership, building a coordinated approach and deliberate response to city challenges”.

In addition, ever greater transparency and accountability will support all and any of our corporate priorities in that we are answerable to those we serve who, then, would be better able to understand our progress in achieving the outcomes set out in our Community-Led Plan. This enables “**a fairer Norwich**” that is both democratic and equitable, “**putting inclusion front**”



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and centre of all our thinking” and **“using evidence to inform the services we provide”** [both guiding principles within the Plan].

4. **Support for devolution:** local government reorganisation seeks to establish balanced and effective partnerships with Strategic Authorities and between unitary authorities, with each representing a distinct community of interest. This provides a strong foundation for shared strategic thinking on regional issues, whilst maintaining a key focus on local need.

This supports our guiding principle [Community-Led Plan] to **“work in partnership”** and the aims of being a *collaborative council [an open and modern council]*. From an equalities perspective, it enables us to retain effective county-wide partnerships to ensure a joined up approach and strengthen local services – notably across health and well-being (for example); collaborative market management – working across East and West Norfolk to address cross-boundary challenges while tailoring services to deeply understood local needs in the context of children’s social care (for example); and the longer-term opportunities to collaborate with the other two unitaries for economies of scale and increased purchasing power which, in turn, will make services more effective and efficient, so benefiting local people.

5. **Economic growth and development:** creating stronger local governance frameworks can drive regional economic prosperity, allowing for local plans to reflect local needs, raise living standards and address persistent inequality.

This wholly supports our corporate priority **“a prosperous Norwich”** amongst others, across all of its aims; these being that *Norwich is a great place to live, work, learn and visit*; it is a place where *business thrives in an inclusive, resilient economy*; where *everyone has access and opportunity to great jobs*; and where there are *better incomes* for all. As per the narrative under this priority, economic growth will be a catalyst to enable “support for people into work, particularly in our most disadvantaged communities”; “better standards of living” and a more “inclusive” economy.

Similarly, it supports all the aims of our “a fairer Norwich” priority, which seeks to ensure better health outcomes and longer life expectancy; a city and local neighbourhoods that are safe, diverse and vibrant; good quality homes for all; and focuses on tackling the root causes of disadvantage. By enabling data-driven decision making and using the right key metrics to do this, local governance frameworks support councils (and partners) to prioritise effectively and allocate resources where they are most needed, with outcomes from benchmarking and peer learning, informing and supporting successful outcomes.

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*



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Alongside the publication of the English Devolution White Paper on the 16 December, the Ministry of Housing, Communities and Local Government (MHCLG) [wrote to all Norfolk Leaders on 5 February 2025](#) inviting them to work with other council leaders in the area to develop a proposal for Local Government Reorganisation (LGR).

The letter clearly outlines the requirement that all local authorities across Norfolk submit an interim plan by 21 March 2025 and a full proposal by 26 September 2025. Failure to submit proposals for local government reorganisation in Norfolk would risk proposals being developed by other local leaders which may not fully take account of, or represent, the unique urban priorities, challenges and opportunities that characterise Norwich, and which, ultimately, promote disadvantage and inequity.

Which wards will be impacted by your proposal?

- | | |
|--|--|
| <input checked="" type="checkbox"/> ALL Norwich City Council wards | <input type="checkbox"/> Mile Cross |
| <input type="checkbox"/> Bowthorpe | <input type="checkbox"/> Nelson |
| <input type="checkbox"/> Catton Grove | <input type="checkbox"/> Sewell |
| <input type="checkbox"/> Crome | <input type="checkbox"/> Thorpe Hamlet |
| <input type="checkbox"/> Eaton | <input type="checkbox"/> Town Close |
| <input type="checkbox"/> Lakenham | <input type="checkbox"/> University |
| <input type="checkbox"/> Mancroft | <input type="checkbox"/> Wensum |

Does your proposal impact any of the council's Reducing Inequality Target Areas (RITAs)?

When specifying [RITA areas](#), please refer to the area's profile which can be found through this link to the [Indices of Multiple Deprivation \(IMD\)](#) and consider its specific characteristics to inform this EqIA.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Catton Grove | <input checked="" type="checkbox"/> North City Centre |
| <input checked="" type="checkbox"/> Earlham | <input checked="" type="checkbox"/> Pilling Park |
| <input checked="" type="checkbox"/> Heartsease | <input checked="" type="checkbox"/> Vauxhall Street |
| <input checked="" type="checkbox"/> Mid Lakenham | <input checked="" type="checkbox"/> West Pottergate and Russell Street |
| <input checked="" type="checkbox"/> Mile Cross | |

What outcomes do we want to achieve, why and for who? *(Include references to specific groups of people and the inequalities faced, including health inequalities)*

As set out in the [Interim Plan](#) for local government reorganisation in Norfolk, which has been developed through a collaboration of all Norfolk district councils, a Greater Norwich Unitary Authority within a three unitary model presents the strongest case for enhancing public service delivery, maintaining appropriate place identities and delivering long-term economic resilience. It addresses the distinct needs of the city and enables the other two proposed unitary authorities to do the same, driving efficiencies and tackling the root causes of disadvantage through innovative service delivery models and preventative and early intervention approaches.



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Through engagement at both member and officer level, and with the support of our district council partners, we have built on the work of the district to further define the distinct challenges and opportunities that a Greater Norwich urban model presents, including the outcomes that such a model could achieve. These are set out in [‘A Case for Greater Norwich – supporting the Interim Plan’](#) and include:

- Set the right foundation for long-term sustainable growth and prosperity;
- Deliver transformed services better tailored to the needs of an urban area;
- Provide a stronger platform for local voices and democratic representation; and
- Deliver the best outcomes for the [proposed Norfolk and Suffolk Mayoral Combined County Authority](#) and ensure that services meet the distinct needs of urban, rural and coastal areas.

Complementing this, we have undertaken a significant engagement exercise locally (with residents and other stakeholders within Norwich), and collaboratively with our county partners, under the Future Norfolk banner. These two engagement exercises are described in detail within the appendices to the report this EqlA supports.

The Norwich-specific engagement activities included in-person roadshows in every Norwich ward, consultative meetings with Youth Advisory Boards, workshops targeting VCSE organisations, targeted stakeholder sessions, and press releases, all of which will be supported by the distribution of the Citizen residents’ magazine featuring a detailed article on LGR and devolution in September 2025. This will be distributed to 70,000 homes.

Additionally, the Future Norfolk engagement involved a shared online platform, a survey generating over 5,000 responses, partner engagements, and social media broadcasts.

Details of response rates and interactions, along with the findings themselves are detailed in the report. The findings have informed our thinking within the bid and what might happen during any transition period. Notably – from an equalities perspective, there has been a clear and understandable desire from partners that LGR should not break what works well and should not harm or disadvantage service users – particularly through change. More importantly, it was felt it should be a catalyst for positive improvements and an opportunity to look at more fundamental ways of delivering better.

Also, within the appendices (and in response to the above), the blueprints for Greater Norwich set out a strong emphasis on equality through the design of future service models. A consistent theme is the prioritisation of early intervention and prevention, recognising that timely, joined-up support can reduce inequalities and improve outcomes for those most at risk. The proposals also stress the importance of partnership working across local government, health, education, and the voluntary and community sector, ensuring



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that services are co-ordinated and responsive to diverse needs. These principles are underpinned by a commitment to integrated working, shared data, and predictive analytics to identify and address issues before they escalate.

Localised support is another key feature, with neighbourhood hubs, mobile teams, and community-based provision designed to tackle geographic and digital exclusion, particularly in rural and deprived areas. This approach aims to embed accessibility and inclusion at the heart of service delivery, while leveraging local knowledge and collaboration to reduce barriers and promote fairness. By aligning with national initiatives such as Family Hubs and NHS neighbourhood models, the blueprints position Greater Norwich to deliver services that are prevention-focused, community-driven, and tailored to the unique characteristics of its population.

Will anyone be disproportionately affected by the programme? (*Customers, employees, those with protected characteristics or groups in the wider community*). You may refer to this template's [EqIA guidance document](#) for suggested equality considerations.

Overview

Devolution and Local Government Reorganisation represent a major shift in how public services are structured and delivered across Norwich and Norfolk. The ambition is to simplify governance, improve efficiency, and design a more responsive system that better meets the needs of residents through enhanced local decision-making.

These changes will be felt most by those who rely heavily on council services – namely individuals, households and communities facing multiple forms of inequality and deprivation. In Norwich, this includes all characteristics protected under the Equality Act 2010, those facing health inequalities, refugees and migrants, those who have served or continue to serve in the Armed Forces, and those who face socio-economic hardship, noting the council's recent adoption of the Socio-economic Duty.

The following section outlines headline issues that may arise through the process of local government reorganisation in Norfolk, categorised by broad stakeholder group. As the decision on the structure of unitary local government in Norfolk is still unknown pending Government's decision in March 2026, much of this analysis is provisional and general in nature, aiming to anticipate potential impacts rather than describe definitive outcomes.

RESIDENTS: potential negative impacts

Communicating changes to service delivery

Poorly communicated changes to how services are delivered can disproportionately affect residents who are already navigating complex needs or limited access to information. Individuals with disabilities, older adults, those with limited digital literacy, and people for whom English is not a first language may face barriers in understanding or responding to service changes. If



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communication is not timely, accessible, and inclusive, there is a risk that some residents may miss out on essential services, experience confusion about where to seek support, or feel excluded from decision-making processes. **Ensuring that communication strategies are tailored to diverse needs will be critical to maintaining trust and continuity of care during periods of transition.**

Service disruption

During periods of structural change, there is a heightened risk of disruption to essential services, particularly those relied upon by vulnerable or high-needs groups. Temporary gaps in provision, changes in service access points, or delays in response times may lead to confusion, unmet needs, and increased pressure on informal support networks. Residents who depend on consistent care, housing support, or social services may be disproportionately affected if contingency planning is not robust. **Ensuring continuity, clarity, and coordination across transitioning services will be critical to safeguarding wellbeing during reorganisation.**

Accessibility of services

Local government reorganisation may unintentionally create new barriers to accessing services, particularly for residents facing digital or geographic exclusion. A shift toward online service delivery may disadvantage individuals without reliable internet access, digital skills, or assistive technologies. Changes to physical service locations or administrative boundaries could make it harder for individuals in remote or under-served areas to reach essential support, especially those with limited mobility or transport options. **To help mitigate these risks, it is vital that accessibility is treated as a core design principle – ensuring services remain inclusive and responsive to the diverse needs of all communities.**

Individuals and communities with Protected Characteristics

Individuals with protected characteristics under the Equality Act 2010 – such as older adults, disabled people, and ethnic minorities - may be disproportionately affected if equality impact assessments are not robust. Changes in service access points, digitalisation, or reduced local engagement could unintentionally marginalise these groups. **Equality considerations will therefore be embedded in all service redesigns, with targeted engagement for groups at higher risk of exclusion. Impact monitoring through equality impact assessments will continue post-implementation of service restructuring to identify and address emerging inequalities.**

RESIDENTS: potential positive impacts

Holistic service delivery



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Local government reorganisation presents an opportunity to design services that are more integrated and responsive to the unique characteristics of communities. By aligning delivery across services that impact the wider determinants of health, including housing, health, education, and employment, this approach has the potential to drive better outcomes, particularly for residents with complex or overlapping needs. A focus on prevention and early intervention, as discussed in the blueprints in the appendices to the report helps to mitigate disadvantage, reducing impacts and delivering better outcomes for residents.

Local place identity

Local government reorganisation can strengthen the connection between residents and the places they live by aligning services and decision-making more closely with local identity and community priorities. When governance structures reflect the unique character, history, and needs of an area, it can foster a greater sense of belonging and civic pride. This can be particularly empowering for communities that feel underrepresented or disconnected from broader regional strategies. By embedding local voices into the design and delivery of services, reorganisation has the potential to reinforce place-based identity and support more inclusive, community-led development.

Devolved powers and decision-making

The transfer of powers from central Government to local areas through reorganisation can enable more responsive and locally attuned decision-making. For residents, this means services and policies shaped by local leaders with a deeper understanding of local context. In the context of the proposed Norfolk and Suffolk Mayoral Combined County Authority, securing meaningful influence within this structure as a Greater Norwich Unitary Authority could amplify the voice of communities across Norwich, ensuring that regional strategies reflect urban priorities, challenges and opportunities.

EMPLOYEES: potential negative impacts

Changes to work base

Local government reorganisation may result in changes to employees' primary work locations, which can disproportionately affect those with caring responsibilities, disabilities, or limited access to transport. Relocation or centralisation of services could increase commuting times or create logistical challenges, particularly for those who rely on public transport or require workplace adjustments. Without flexible working arrangements or adequate support, these changes may reduce accessibility and impact employee retention.

Workforce planning should therefore consider the impact of relocation or centralisation on staff with caring responsibilities, disabilities, or limited transport options. Flexible and hybrid working arrangements will also be considered, alongside reasonable adjustments for staff with disabilities or caring responsibilities.



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Differential impact of reorganisation and redundancies

The restructuring process may have uneven effects across different roles, departments, and grades, with some employees facing a higher likelihood of redundancy or redeployment. This can lead to perceptions of unfairness, especially if the criteria for selection are not transparent or inclusive. Employees from underrepresented groups may be more vulnerable to adverse outcomes if equality considerations are not embedded in workforce planning. **Transparent selection criteria and equality monitoring should therefore be embedded in workforce planning; and redeployment opportunities and targeted support for underrepresented groups should be offered to reduce disproportionate impacts.**

Working conditions and morale

Uncertainty surrounding job security, organisational change, and future roles can negatively affect employee morale and wellbeing. Individuals may experience increased stress, reduced motivation, and disengagement, particularly if communication is unclear or inconsistent, noting tight implementation timescales may further exacerbate stress and limit opportunities for meaningful staff consultation and support. **To mitigate these impacts, open dialogue, inclusive consultation, and visible leadership will be critical throughout the transition process, with adequate consideration given to staff wellbeing, opportunities for meaningful dialogue, and measures to retain organisational knowledge throughout the transition.**

EMPLOYEES: potential positive impacts

Opportunities for progression

Conversely to the points made above, reorganisation will offer opportunities for employees in terms of career progression, professional development and skills acquisition as new roles are defined and promoted. This will likely benefit those in the early stages of their careers (notably younger people or those returning to work after a career break) with natural attrition amongst those nearing the end of their time working, taking early retirement or other.

Opportunities to diversify the workforce

Similarly, as new jobs within the new structure are advertised, an opportunity arises to ensure greater workforce diversity by ensuring that openings are promoted amongst groups least represented within the current staffing at the council, supporting the ambition to develop a workforce that better represents the communities the successor council will serve.

COUNCILLORS: potential negative impacts



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Councillor engagement

Reorganisation may reduce the number of councillors or alter ward boundaries, potentially weakening local representation. Councillors may struggle to maintain close ties with constituents during the transition, especially if public engagement is limited or rushed due to tight delivery deadlines. **Governance arrangements will therefore ensure that an adequate number of Councillors is proposed in order to serve the needs of the successor body across committee, constituency and public benefit considerations so that constituents continue to have meaningful access to decision-makers and local voices remain influential in shaping services.**

Going forwards:

We will continue to refine our assessment of impacts as implementation plans progress. Notably, this EqlA will be revisited at key milestones throughout the transition period, sharing intelligence and working closely with the new shadow unitary authority from its establishment in May 2027, with responsibility for equality ultimately transferring to that authority on vesting day (1 April 2028).

In the interim, this EqlA helps ensure equality considerations are embedded from the outset of reorganisation work; as will the following set of headline guiding principles, which we have designed to mitigate negative impacts and prevent exclusion.

These principles include:

- Going beyond statutory consultation requirements by engaging with all residents and affected groups through accessible and inclusive communications across multiple platforms throughout the reorganisation period;
- Ensuring continuity of essential services during the transition, supported by clear arrangements to minimise disruption;
- Ensuring changes to services or eligibility criteria are evidence-based and underpinned by robust data;
- Ensuring decisions are transparent and equitable; and
- Integrating equality and socio-economic considerations into all internal policies and implementation processes on an ongoing basis.

If yes, will these be adverse impacts? *(specify whether high, medium or low impacts)*

The potential negative impacts of the LGR process have been identified in the field above. These negative impacts are likely to be categorised as medium in severity.



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<p>If yes, can the impacts be</p>	<p>a) justified? Yes</p>	<p>b) mitigated? Negative impacts can be mitigated as long as we follow the specified mitigations above and continue to revisit this EqIA as progress with the reorganisation moves ahead, involving all parties invested in the transition.</p>
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Negative outcomes action plan. *Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.*

Actions identified from EqIA	Target completion date	Responsible Officer (role)	Comments	Action complete
Deliver timely, accessible, and inclusive communications across multiple platforms to ensure residents understand service changes, addressing risks of exclusion for those with disabilities, language barriers, or limited digital access.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)		<input type="checkbox"/>
Put robust contingency plans in place and coordinate services to maintain continuity during transition, addressing risks of disruption for vulnerable or high-needs groups.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)		<input type="checkbox"/>
Embed accessibility as a core design principle, maintaining both digital and physical access options to address risks of exclusion for residents facing digital poverty, mobility issues, or geographic isolation.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)		<input type="checkbox"/>



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Offer flexible and hybrid working arrangements, alongside reasonable adjustments, to address impacts of relocation or centralisation on staff with caring responsibilities, disabilities, or limited transport options.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)	<input type="checkbox"/>
Apply transparent selection criteria, embed equality monitoring, and provide redeployment and targeted support to address disproportionate impacts of redundancies on underrepresented groups.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)	<input type="checkbox"/>
Maintain open dialogue, inclusive consultation, and visible leadership throughout the transition to address uncertainty and protect employee morale and wellbeing.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)	<input type="checkbox"/>
Ensure future governance arrangements maintain meaningful access to decision-makers and embed strong public engagement to address risks of reduced local representation during transition.	LGR transition period (6 May 2027 – 1 April 2028)	SRO for LGR (Head of Strategy, Engagement & Culture)	<input type="checkbox"/>

Once complete, please email this assessment to: strategy@norwich.gov.uk.

For the assessment to be final, the relevant people agreeing it must sign it off – please see signatories panel overleaf.

Officer completing assessment	Alia Mekheimar	Date	28 August 2025
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Senior Leadership Team sponsor	Helen Chamberlin	Date	29 August 2025
Equality lead (strategy team)	Nick Bodger	Date	29 August 2025



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