City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	City Development
Service Area:	Communications and Engagement
Name of the proposal :	Ceasing routine use of X (Twitter)
Lead officer:	Jonathan Byrne
Date assessment completed:	22 April 2025

Names of those who contributed to the assessment :			
Name	**Job title**	**Organisation**	**Area of expertise**
Claire Foale	Chief Strategy Officer	City of York Council	Policy, strategy, and communications

Step 1 – Aims and intended outcomes

1.1	**What is the purpose of the proposal?** Please explain your proposal in Plain English avoiding acronyms and jargon.
	To cease using X as a routine communications channel due to declining engagement, algorithmic suppression of information, and the platform's role in spreading misinformation and hate. The platform will only be used during emergency incidents, and all other accounts will be deactivated or made dormant.

1.2	**Are there any external considerations?** (Legislation/government directive/codes of practice etc.)
	- Civil Contingencies Act (statutory duty to "warn and inform") - Equality Act 2010 - Human Rights Act 1998 - Consultation with the Local Government Association and city partners

1.3	**Who are the stakeholders and what are their interests?**
	- York residents (interest in clear, accurate, and inclusive communications) - Staff responsible for account management - Elected members (own accounts unaffected) - Emergency services (coordinated emergency comms) - Vulnerable groups (who may need timely and trusted updates)

1.4	**What results/outcomes do we want to achieve and for whom?** This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.
	- Promote more trusted channels (e.g., newsletter, Facebook) - Reduce risk of misinformation, impersonation, and abuse - Maintain incident communication readiness - Align Council values with its communication choices (trust, respect, inclusion) - Support the Council Plan 2023–27: "Engaging residents in decisions"

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.
Source of data/supporting evidence	**Reason for using**
Channel engagement data	Quantifies declining reach and engagement on X
Public concerns	Residents have expressed discomfort with council presence on X
LGA and partner insight	Validates risks with X and alternative approaches
Benchmarking	Reviews approaches by other councils and public bodies
Budget consultation	Only 8% of residents prefer X; e-newsletter most favoured
Internal staff feedback	Operational insights on account management burdens

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
Gaps in data or knowledge	**Action to deal with this**	
Long-term impact of leaving X on hard-to-reach groups	Monitor engagement across other platforms post-transition	
Impact on digitally excluded groups	Continue promoting offline channels (e.g., phone support, print)	

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	**Key Findings/Impacts**	**Positive (+) Negative (-) Neutral (0)**	**High (H) Medium (M) Low (L)**
Age	Mix of older and younger users across platforms	0	L
Disability	Reduced exposure to harmful or inaccessible content	+	M
Gender	N/A	0	L
Gender Reassignment	Reduced exposure to platform often hostile to trans voices	+	M
Marriage and civil partnership	N/A	0	L

Pregnancy and maternity	N/A	**0**	**L**
Race	**Less risk of encountering racist abuse through council presence**	**+**	**M**
Religion and belief	N/A	**0**	**L**
Sexual orientation	**Reduces exposure to hate content**	**+**	**M**
Other Socio-economic groups including :	**Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?**		
Carer	N/A	**0**	**L**
Low income groups	**Focus on cost-effective, accessible channels (newsletter)**	**+**	**M**
Veterans, Armed Forces Community	N/A	**0**	**L**
Other	N/A		
Impact on human rights:			
List any human rights impacted.	**Upholds dignity, reduces misinformation, develops trust**	**+**	**M**

Use the following guidance to inform your responses:

Indicate:

EIA 02/2021

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

High impact (The proposal or process is very equality relevant)	There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.
Medium impact (The proposal or process is somewhat equality relevant)	There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights
Low impact (The proposal or process might be equality relevant)	There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?

- **Mitigations:**
  - Retain @CityofYork account to prevent impersonation and retain emergency use.
  - Clearly signpost to other channels (website, e-newsletter, etc.).
  - Monitor reach and adjust strategies as needed.
- **Opportunities:**
  - Promote inclusive, respectful channels.
  - Pilot new platforms like Bluesky and WhatsApp.
  - Align communication approach with council values.

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:

- **No major change to the proposal** – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.

- **Adjust the proposal –** the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.

- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty

- **Stop and remove the proposal –** if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
Adjust the proposal – the EIA identifies risks (e.g., impersonation, access) that are mitigated via account retention, emergency use, and alternate platforms.	The proposal supports equal access, protects human rights, reduces exposure to abuse, and maintains emergency readiness while promoting trust and inclusion.

Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.		
Impact/issue	**Action to be taken**	**Person responsible**	**Timescale**
Digital exclusion	Promote alternative channels (print, phone)	Comms team	Ongoing
Accessibility	Ensure other channels meet accessibility standards	Comms team	Immediate
Review & evaluation	Monitor performance of alternative platforms	Digital team	6-month review

Step 8 - Monitor, review and improve

8. 1	**How will the impact of your proposal be monitored and improved upon going forward?** Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	The Comms team will monitor engagement, gather feedback from service areas and communities, and report findings quarterly. Adjustments will be made based on audience insights, particularly for under-represented groups.