

# Equality Impact Assessment

## Introduction

The Council's Single Equality Scheme states that:

*“We will achieve equality of opportunity by removing direct and indirect discrimination wherever it exists. It is recognised that people may be disadvantaged because of their: age; gender; race, colour, ethnic, national, cultural or social origin; disability; religious belief, or non belief; marital status, family circumstances, or caring responsibilities; sexual orientation; class, level of income, or housing circumstances; membership or non membership of trade unions, or involvement or non involvement in trade union activity.”*

The Single Equality Scheme brings together action plans for Race, Gender and Disability equality, meeting the Council's statutory duties in these areas. The scheme also goes beyond these three streams and begins to consider how the Council develops its approach to equalities and diversity for all residents of Stockton in response to the recent Equalities Review report, Discrimination Law Review and the report of the Commission on Integration and Cohesion. The Council is also committed to responding to all diversity related legislation and the single equality scheme is the best mechanism for achieving this. Equality Impact Assessments play an integral role in ensuring that all the council policies are operating to support these aims to offer the highest level of service for all our residents

## What is an Equality Impact Assessment?

An Equality Impact Assessment (EIA) is a tool to enable individuals and services to think carefully about and measure the impact that procedures, policies and strategies will have on all its service users. EIAs can be used to assess whether the policies that guide your work, the procedures you operate and the day-to-day working practices you have developed are likely to have a positive or negative impact across the diverse communities we serve in the Borough. This will enable us to plan out or minimise any negative consequences across the six diversity strands:

- Age
- Disability
- Faith
- Gender
- Race
- Sexual Orientation

We can then take action to prevent and eliminate unlawful direct and indirect discrimination, promote equality of opportunity and contribute positively to community cohesion objectives. Providing services that do not discriminate also leads to better quality services and increased satisfaction.

## Why Undertake Impact Assessments?

### **Improving the services we offer**

The purpose of Equality Impact Assessment is to improve the work of the Authority by ensuring it does not discriminate in the way it provides services and employment and that we promote equality and positive community relations across the six diversity strands. To understand why EIAs are necessary requires agreement that equality is not about treating everyone the same. It may mean accommodating individual requirements and taking the needs of different communities and groups into account when delivering services. The outcomes of a service must be the same for all service users, however the way they receive that service may very well differ.

## **Being systematic about how we measure impact**

This guide will provide you with a means of systematically assessing and recording the actual, potential or likely impact of a service or project on particular groups and identifying associated actions to improve services. EIAs are a good method of analysing what we are doing using the service user and their needs as our focus as well as considering potential impact of any new strategies.

The benefits of impact assessments include:

- Identifying whether we are excluding different groups from any of our services
- Identifying if direct or indirect discrimination exists
- Allowing us to consider alternative policies or strategies to address adverse impact
- Enabling us to embed equality issues into all our policy areas and everyday practice
- Targeting resources more effectively
- Developing a better understanding of the needs and aspirations of the diverse communities that we serve
- Developing good practice that promotes equality across all the diversity strands
- Raising public satisfaction with services and the Council

## **It is a Statutory Requirement**

There are specific statutory duties for race, disability and gender through the Race Relations (Amendment) Act 2000, the Disability Discrimination (Amendment) Act 2005 and the Equality Act 2006 to ensure that our policies and practices do not discriminate against any group within our community and that we promote equality of opportunity and good community relations. This impact assessment however will extend beyond this to cover age, faith and belief and sexual orientation as well as disability, race and gender. This will ensure that we are working with other statutory equality drivers including the Sex Discrimination Act, the European Directives on age, faith and sexual orientation and the Equality Standard for Local Government.

## **Links to other Council Initiatives**

The work we do on Equality Impact Assessments will link to a number of other local and national priorities including:

### **Comprehensive Performance Assessment**

If our services are to be of the highest quality, which is the aim of CPA, they need to be provided in a way that ensures they meet the diverse needs of all our service users.

### **Service and Business Unit Planning**

Actions identified within Equality Impact Assessments will feed into a range of Council plans at all levels, including corporate, service and, business unit planning .

### **Community Cohesion**

The outcomes of Equality Impact assessments will feed into the Community Cohesion Strategy and our work with key partners on the Local Strategic Partnership

### **Resident Satisfaction**

Ensuring our services are delivered in a non-discriminatory way and meet the needs of all residents will be reflected in increased resident satisfaction results.

## **The Completed Equality Impact Assessment**

Equality Impact Assessments need to be part of the early stages of policy development so that they can be incorporated into any decisions. Whilst they can and will be used retrospectively for policies already approved and functions currently operating, they should never be considered a “bolt-on” to be used to complete the policy development process. Incorporating Equality Impact Assessments into the planning and delivery of services will enable us to integrate and embed equality principles into all areas and aspects of the council’s service delivery. The completed Equality Impact Assessments should be returned to the Diversity Team [diversity@stockton.gov.uk](mailto:diversity@stockton.gov.uk) who will published them on the Diversity section of the council’s website. This meets our statutory duty to publish equality impact assessments. New policies will not be given Cabinet or Council approval without a completed Equality Impact Assessment.

## The 3 Stage Process- Guidance Notes

Once you have identified the aims and objectives of your policy, the 3 Stage Process gives you a robust mechanism to systematically assess it for the impact across the six strands of diversity.

### Stage 1 - Collecting information and data to support the assessment

An effective EIA relies on the effective analysis of both qualitative and quantitative data whether externally or internally developed as this gives us a clear description of the effectiveness of our service provision. Whilst it is tempting to undertake consultation exercises to support your EIA, you are likely to have already undertaken much data collection work throughout the early stages of the policy development, or through an existing policy's ongoing delivery and monitoring. Any decision to collect new data or introduce new monitoring needs to be in proportion to the importance of the policy or service, and mindful of the additional systems or investment that will be required to provide this.

In order to complete the impact assessment you will need to:

- Consider what information or data you have available either within your service or elsewhere in the Council and whether any further data will be needed.
- Use both quantitative (e.g. census, BVPI, Resident Satisfaction, national statistics, research, economic and workforce profile) and qualitative data (customer feedback information, complaints about the service, policy or function)
- There are comprehensive equality profiles available on the equality and diversity pages on the Stockton Borough Council website to support the EIA process [www.stockton.gov.uk/yourcouncil/33299/](http://www.stockton.gov.uk/yourcouncil/33299/)
- Consider information about the take-up and investigate who is not able to access the service or benefit from the policy

Use this data to identify the significant findings or trends, relating to the policy area and any impact across the 6 strands. It will be your judgement to identify what constitutes a significant impact but you must be mindful to consider all data which reflects difference between different groups. The person undertaking the EIA should clearly identify and document gaps and inadequacies in data, explain how these will be addressed and how future impact will be monitored.

## Stage 2 - Scoring the Policy / Function

Once all the information available has been gathered and considered, you can move onto scoring the policy for impact. A simple scoring system and chart is included on the proforma. Again the judgement on whether the policy is having / is likely to have a positive or negative effect under each of the headings is your own, but to help inform the judgement you should bear the following key considerations in mind when coming to your conclusions:

- Will / does the policy / function involve, or have consequences for, the people the council serves or employs?
- Are there any customer groups which might be expected to benefit from the policy / function but do not?
- Is there any reason that people's access to a service may be affected differently by the proposed policy due to age, disability, faith and belief, gender, race or sexual orientation?
- Is there any evidence that any part of the policy / function could discriminate unlawfully either directly or indirectly across the diversity strands?
- Are there any groups which are not satisfied with the policy / function or are more likely to make complaints?
- Is there a need to gather further information in order to assess this policy / function?
- Are there any barriers to the policy / function being received equally by all residents?

The headings that you are being asked to score the policy against are taken from the range of equality duties that the council is required to operate within in order to demonstrate that our services offer true equality of access. This is recommended practice from the Commission for Racial Equality.

If you don't have enough data to make a judgement about the impact of the policy this needs to be recorded as 2<sup>ND</sup> to indicate that the anticipated neutral impact is not based on the data analysis. Where this occurs one of the actions recorded in the action plan will be to show how the lack of data will be addressed prior to the next review.

Some examples of positive and negative impacts are given below, use them to inform your deliberations. Remember something designed to offer extra support to one group of people may also have a positive or negative impact on others and you must be mindful of this. The examples highlight the need to gather and interpret high quality data and to fully understand your customer profile:

**Example 1**

The council has proposed a policy of only using meeting rooms that are fully accessible for disabled people. The data analysis identifies that there are no accessible meeting rooms which can be used located in the area of the town where the majority of BME residents live, therefore there will be a positive impact for disabled people in that all meetings will now be fully accessible

**But**

It may have a negative impact on the number of BME residents attending meetings as they will have further to travel to meeting venues.

**Example 2**

The Youth Service is proposing to increase its youth club provision by purchasing another double-decker Youth Bus. This will increase the number of youth club sessions substantially. The policy will therefore have a positive impact for young people by increasing youth provision across the borough

**But**

It may have a negative impact because data analysis has identified that access to the Youth Buses is limited for disabled young people who are already underrepresented as service users.

**Example 3**

Following consultation with their large print borrowers, the Library Service is proposing to produce a range of new information leaflets in large print. The policy will have a positive impact for disabled users as supported by the consultation findings

**And**

It will also benefit other groups, especially older people.

Where you make a judgement what you are impact assessing will have a positive impact (3), then you will be asked to evidence this and indicate the areas of the policy / function that are demonstrating this positive impact.

Once you have completed the scoring exercise, you will arrive at a total score for the policy / function under review. This score will assist the Diversity Team in determining whether any further work is required.

You may find that for some of the diversity strands there is no evidence to identify either a clear positive or negative impact for the policy function. In this case the score will be 2 (neutral impact) but this will indicate that future data collection needs to investigate this area and that subsequent review of the policy may be required.

Based on the score and the responses in other areas, the Diversity Team will consider whether the policy / function is likely to have a negative impact on one or more groups within the diversity strands and will advise on steps to mitigate this adverse impact before the policy can be implemented, or change it as soon as possible if already in place. This will be either by:

- **Changing the policy / function or amending the way it is delivered** to address stakeholder concerns or issues highlighted by the data or
- **Substantiating the aims of the policy / function as originally proposed** even when it could affect some people or groups adversely, for example because of the policy's importance to meet the specific needs of particular groups and there is no other way of achieving the aims of the policy. This should only be used when the negative impact of not pursuing the policy would be greater than its amendment or withdrawal. As such it should only be used on rare occasions.



## Stage 3 Publication and Monitoring

Once you have completed the EIA form, you will need to complete the summary sheet which gives space to indicate EIA score for the policy / function under review and also detail any remedial action required. You will then need to return the whole form to the Diversity Team [diversity@stockton.gov.uk](mailto:diversity@stockton.gov.uk) who will consider the assessment and make any suggestions or comments where appropriate. Once the assessment is agreed the summary form will be published on the internet under the Equality and Diversity section of the Council's homepage.

Following completion of the EIA process and even if the function / policy under review scores highly you will need to be conscious of the ongoing monitoring process which includes:

- submitting the Equality Impact Assessment Proforma to the Diversity Team for quality assurance checking and publication
- reviewing the equality impact of the policy / function at least on an annual basis and recording any changes
- reviewing the equality impact of the policy / function if it is amended
- including any remedial actions into Service Improvement Plans where required

It is vital to monitor policies / functions continuously to ensure that they are not having any adverse impact on people across the different diversity strands and to be aware that even if the policy / function doesn't change that the needs of communities which it is designed to serve may well do so.

# Equality Impact Assessments Screening Proforma

## Section One: About the Strategy / Policy / Function

<b>Service Group:</b> DANS	<b>Service:</b> Planning Service	<b>Section:</b> Spatial Planning	<b>Lead officer for EIA:</b> Matthew Clifford
<b>Support officers:</b> Isabel Nicholls		<b>EIA Completion date:</b> 23 May 2013	
<b>General information</b>			
<b>(1) Name of Policy / Function:</b>	Draft Supplementary Planning Document 8 – Provision of Affordable Housing and the need for Viability Evidence		
<b>(2) Is this new or existing?</b>	Existing		
<b>(3) What is the overall aim(s) of the policy / function?</b>	The SPD seeks to ensure that the highest possible proportion of affordable housing is achieved on new residential developments, whilst taking market conditions, site constraints and scheme specific issues into account in a fair and consistent way.		

<p><b>(4) What are the objectives of the policy / function?</b></p>	<p>The SPD's objectives are to provide guidance and clarification on the implementation of Core Strategy Policy CS8 Housing Mix and Affordable Housing which was adopted in 2010.</p> <p>This includes ensuring applicants for planning permission and Development Management Officers are aware of:</p> <ul style="list-style-type: none"> <li>• the national and local policy framework</li> <li>• the Council's requirements for setting affordable housing targets within the 15% to 20% range set out in the Core Strategy</li> <li>• The evidence which must be provided if a developer seeks a target for affordable housing provision of less than 20%</li> <li>• The evidence which must be provided if a developer seeks an affordable housing provision less than that agreed with the Council.</li> </ul>
<p><b>(5) Who implements this policy / function within Stockton-on-Tees and how?</b></p>	<p>Development Services Section</p>
<p><b>(6) Are any partner agencies involved in the delivery of this policy / function? If so, whom?</b></p>	<p>Developers and Landowners</p>
<p><b>(7) Are other services affected by this policy / function? If yes which are they</b></p>	<p>All services with a land portfolio (e.g. education, health and social care, land and property management).</p> <p>Housing Strategy</p>

## Data Review and Analysis

The data analysis should be used to identify who are the actual and potential customers for this policy. And any significant findings across the diversity strands

Data Source	When and how collected	Significant findings Age	Significant findings Disability	Significant findings Faith	Significant findings Gender	Significant findings Race	Significant findings Sexual Orientation
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<p><b>Nationally collected Data</b> eg: <b>Census Performance Indicators</b></p>	<p>2011 Census ONS data</p>	<p><b>Population</b> The population is estimated at 191,800<sup>1</sup> living in 79,200 households.<sup>2</sup> Since mid 2001, it is estimated that the population has risen by 4.4%, compared to an increase in the North East of 2.2%<sup>3</sup>. Some of our wards like Northern Parishes, Ingleby Barwick East and Ingleby Barwick West have seen significant growth over the last 10 years.</p> <p>As the following table shows the majority (66%) of residents are of working age (aged 16-64). There are over 37,000 children and young people (aged 0-15) and almost 30,000 older people (aged 66 and over).</p> <table border="1" data-bbox="720 570 1327 943"> <thead> <tr> <th>Age bands</th> <th>Number in population</th> <th>% of population</th> </tr> </thead> <tbody> <tr> <td>0-4</td> <td>12,341</td> <td>6.4%</td> </tr> <tr> <td>5-15</td> <td>24,807</td> <td>12.9%</td> </tr> <tr> <td><b>Children and Young people</b></td> <td><b>37,148</b></td> <td><b>19.4%</b></td> </tr> <tr> <td>16-25</td> <td>25,593</td> <td>13.3%</td> </tr> <tr> <td>26-35</td> <td>23,885</td> <td>12.5%</td> </tr> <tr> <td>36-45</td> <td>26,504</td> <td>13.8%</td> </tr> <tr> <td>46-55</td> <td>27,606</td> <td>14.4%</td> </tr> </tbody> </table>	Age bands	Number in population	% of population	0-4	12,341	6.4%	5-15	24,807	12.9%	<b>Children and Young people</b>	<b>37,148</b>	<b>19.4%</b>	16-25	25,593	13.3%	26-35	23,885	12.5%	36-45	26,504	13.8%	46-55	27,606	14.4%
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<sup>1</sup> Mid 2011 ONS population estimates

<sup>2</sup> Census 2011

<sup>3</sup> Comparisons with ONS mid 2001 and mid 2011 population estimates

**Locally collected data**  
eg: Viewpoint panel, Mori surveys

56-65	22,821	11.9%
<b>Working age</b>	<b>126,409</b>	<b>65.9%</b>
66-75	15,671	8.2%
76-85	9,664	5.0%
86 and over	2,932	1.5%
<b>Retirement age</b>	<b>28,267</b>	<b>14.7%</b>

Source: ONS 2011 Mid-year Population Estimates

The population in the Borough is projected to continue to grow and is projected to reach 206,717 by 2021; which is an increase of 7.8% from 2011.<sup>4</sup> This includes the number of older people is expected to rise rapidly; the number of residents that are of retirement age is projected to increase by 27% by 2021.<sup>5</sup> This includes an increase of almost twice as many people aged 90 and over. The number of children and young people is expected to increase also, some 13.4% by 2021. Whereas, the number of working age people is only expected to increase by 1.4%.

**Ethnic Group**

In the 2011 Census, 5.8% of the Stockton-on-Tees population defined themselves as non-White, equating to 181,229 people (responded that their ethnic group was Mixed, Asian or Asian British, Black or Black British, Chinese or other ethnic group). This is an increase from 2.8% in the 2001 Census. The largest BME community in Stockton-on-Tees have a Pakistani or British Pakistani origin.

**Religion**

In the 2011 Census, 68.2% of the Stockton-on-Tees population stated that they were a Christian. This is a much smaller proportion than in 2001 (-13.4%pt change), this decrease was also seen nationally. In 2011 compared with 2001 there has been a large increase in the proportion of people who stated that they had no religion (from 10.0% to 22.4%), this proportion is slightly lower than the proportion with no religion nationally (25.1%).

**Health**

For Stockton-on-Tees, the gap in life expectancy between the most deprived and least deprived areas within the Borough is very wide. Males in the most deprived areas are estimated to live 15.3 years less than their equivalents living in the least deprived areas; in addition, females living in the most deprived areas are estimated to live 11.3 years less.<sup>6</sup> Stockton-on-Tees has the largest health inequalities in the Tees Valley.

In the Census 2011, 19.0% of people said that their day-to-day activities are limited. These

<sup>4</sup> Interim ONS 2011 Subnational Population Projections  
<sup>5</sup> Interim ONS 2011 Subnational Population Projections estimates.

<p><b>Service area data</b> eg: <b>comments and complaints, user surveys or evaluation forms</b></p>		<p>Core Strategy Policy CS8 Housing Mix and Affordable Housing which was subject to five periods of public consultation from 2006 to its adoption in 2010. The details of these and the impact they had on the emerging policy are included in the Consultation Statement which accompanies the document.</p>
<p><b>Other data</b></p>		

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<sup>6</sup> Association of Public Health Observatories (APHO) - Slope Index of Inequality for Life Expectancy (using 2006-2010 data)

## Stage 2 Scoring the Policy

Now that you have all the information available you can move onto scoring the policy for impact:

	Does it reduce discrimination?	Does it or is it likely to promote equality of opportunity?	Does it promote good relations between these groups?	Does it encourage participation in public life and access to council services?	Does it promote positive attitudes and images to different groups?	Total Score for strand
Age	3	3	3	2	2	13
Disability	3	3	3	2	2	13
Faith/Belief	2	2	3	2	2	11
Gender	3	3	3	2	2	13
Race	2	2	3	2	2	11
Sexual Orientation	2	2	3	2	2	11
<b>Total Score</b>						<b>72</b>

### Scoring System:

- Score 3 if the policy has a positive effect
- Score 2 if the policy has a neutral effect
- Score 1 if the policy has a negative effect
- If a score has been awarded due to lack of data rather than anticipated effect please indicate by using **ND**



## Evidencing the Score

Positive impact scores (3) should be evidenced in the table below.

Score being evidenced	Reference / Source	Significant findings Age	Significant findings Disability	Significant findings Faith	Significant findings Gender	Significant findings Race	Significant findings Sexual Orientation
Age, disability, gender	Draft Supplementary Planning Document 8 – Provision of Affordable Housing and the need for Viability Evidence	The SPD seeks to ensure that the highest possible proportion of affordable housing is achieved, whilst taking market conditions, site constraints and scheme specific issues into account in a fair and consistent way. Using the SPD as a material consideration when determining planning applications will increase the supply of affordable housing across the Borough and benefit residents with low incomes.					
All	Draft Supplementary Planning Document 8 – Provision of Affordable Housing and the need for Viability Evidence	The SPD will also promote sustainable mixed communities which will benefit all residents of the Borough. This will be achieved by requiring that affordable homes are provided on-site, 'pepper potted' amongst the wider development unless applicants can demonstrate that this would be economically unviable or would not contribute to the development of sustainable mixed communities. In these circumstances provision will be required off site.					

## Action Plan:

This action plan highlights that will address the issues highlighted in the Equalities Impact Assessment. Longer term issues will be developed into actions within the relevant Service Improvement Plan. They will also be included in the Disability, Gender and Race Action plans that form part of the Council's Single Equality Scheme

Key Actions	Who is responsible?	Timescale
Adopt 'Draft Supplementary Planning Document 8 – Provision of Affordable Housing and the need for Viability Evidence' as Council policy and authorise its use as a material consideration in the determination of planning applications with immediate effect, prior to its adoption as part of the Development Plan.	Planning Services	With immediate effect
Undertake a six week public consultation on 'Draft Supplementary Planning Document 8 – Provision of Affordable Housing and the need for Viability Evidence' in accordance with the Local Development Framework Statement of Community Involvement.	Planning Services	July to September 2013

Stage 3 Publication and Monitoring	Published Score
Date of Publication 22 July 2013.....	<b>72</b>
Date Set for Review October 2013 (prior to adoption of SPD by Council) .....	