



WDC Equality Assessment form

people ● place ● pounds

Equality Impact Assessment

Name of project/strategy/service being assessed	Wycombe District Local Plan	Cabinet meeting date <i>If applicable</i>	
Service area	Spatial Planning - Planning and Sustainability	Date EIA created	21.07.17
Name of Completing Officer	Aude Pantel		
Approved by Head of Service	Penelope Tollitt	Date approved	06.09.17

Equality Impact Assessments (EIA's) are designed to ensure that Wycombe District Council complies with all relevant legislation and fulfils its duty under the Public Sector Equality Duty (PSED). This comprises of three limbs which are set out in Section 149(1) of the Equality Act 2010. This requires that all public bodies, in the exercise of its functions, to have '**due regard**' to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Each service area has an Equality Champion (see the Equalities tab on WySpace for an up to date list). Please ensure that the relevant Champion is aware that an EIA is being undertaken as, if needed, your Equality Champion can provide advice and guidance on completing the EIA. Guidance on the completion of an EIA, along with information on the PSED and protected characteristics can be found in the documents section of the Equality page on WySpace (via the Corporate tab), along with a quick reference guide located here as Appendix 1.



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Stage 1 – Initial Scope of the Equality Impact Assessment

Please answer the five questions below to determine whether a full EIA needs to be conducted.

Will the service/policy/strategy affect any people or groups of people directly (including staff/members of the public)?	Yes	✓	No	
Will it affect how other services are provided?	Yes	✓	No	
Will it have employment implications?	Yes	✓	No	
Do you have information suggesting that this service/policy/strategy will affect particular groups of people?	Yes	✓	No	
Do you need further information or to undertake further research to answer any of the above questions?	Yes	✓	No	

If the answer to any of the above is 'yes', then a full EIA will need to be carried out and Sections 2- 4 will need to be completed.

If the answer to all of the above is 'no' then a full EIA does not need to be carried out, but to ensure consistency in approach, the EIA will need to go through the Challenge Process. Please e-mail the EIA to Vickie McSwiggan, Policy Officer at Vickie.mcswiggan@wycombe.gov.uk who will review and discuss as necessary. Then, if following the Challenge Process:

- a) it is agreed with the Policy Officer that no further stages need to be completed the Head of Service needs to approve the assessment and return a Word electronic copy to the Policy Officer for publication.

OR

- b) it is agreed with the Policy Officer that Stages 2 - 4 need to be completed, then the Head of Service will need to approve only once the full EIA is completed at which point a Word electronic copy should be returned to the Policy Officer for publication.



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Stage 2 – Information Gathering/Data Collection

<p>What are the aims of the strategy/policy/procedure? Why is it necessary? What is it trying to achieve?</p>	<p>The Wycombe District local plan is produced as part of the District’s Development Plan (the overarching planning policy framework for the District’s future use of land).</p> <p>The Wycombe District local plan will set out housing targets for the District and will address strategic housing, economic and infrastructure issues including housing and mixed use allocations, and gypsies and travellers, up to 2033.</p> <p>The Wycombe District local plan will include policies and proposals for the protection and provision of employment land and review other aspects of the adopted Core Strategy and Local Plan as appropriate. The new local plan will set out site and development management proposals to replace, as appropriate, remaining saved Local Plan policies.</p> <p>The new local plan will sit alongside the adopted Delivery and Site Allocations Plan for Town Centres and Managing Development Plan¹, and any further adopted Development Plans, including minerals and waste plans and plans from the neighbourhood planning process.</p>
<p>Which aspects of the policy/strategy/procedure are relevant to equalities? NB A list of impacts is NOT required at this stage, just identify areas – can be a bullet point list.</p>	<p>The public will be affected by the level, location and type of development planned for the District to 2033.</p>

¹ Two policies in the DSA plan in relation to flood risk and water efficiency standards are deleted and replaced with new policies in the Wycombe Local Plan due to changes in national policy and guidance.



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Identify the main data sources / information gathered

e.g. Workforce reports, census data, staff survey etc.

All residents of (and visitors to) the District will be users of and/or directly/indirectly affected by the proposals contained within the new local plan. Service providers and developers (private sector) will also be affected by the proposals.

The main sources of information on current & future residents of the district (including age and ethnicity) are:

- The Census, which is carried out every 10 years (the results of the 2011 census are now available)
- The Registrar General's Mid-Year Population projections (produced annually)
- WDC-produced District & Community Areas-based profiles also set out information on demographics and users at a more local level.
- Government population projections, household projections and census analysis incorporated in the draft Housing and Economic Needs Assessment December 2016)

Regular monitoring of development within the District is undertaken, and is reported annually through the Wycombe Monitoring Report (AMR).

As part of preparing the new local plan a range of technical studies have been produced to assess needs and issues², and these inform the proposals contained within the Wycombe District Local Plan.

The Council has also developed a database which records details of planning & land agents and their clients and private developers who operate within the District. A

² These studies are available on our website at <https://www.wycombe.gov.uk/pages/Planning-and-building-control/New-local-plan/New-local-plan-supporting-evidence.aspx> and <https://www.wycombe.gov.uk/pages/Planning-and-building-control/New-local-plan/Princes-Risborough-town-plan.aspx>



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	<p>Planning Agents Panel is in operation which meets quarterly to discuss issues affecting the operations of the Council and the private sector. A Planning Forum also meets annually to discuss service issues. The database also records details of service providers (public & private) who operate within the district. These organisations are all consulted throughout the development of the new local plan.</p> <p>What this has told us (key points)</p> <ul style="list-style-type: none"> • Due to a number of factors there is a need to build more new homes than planned for previously. • There is a need for affordable housing, • There is also a need to provide land for employment uses that provide jobs. • This will result in extra demands on existing infrastructure and requirements for new infrastructure. • The scale of growth means we need to look at strategic options such as a major expansion of Princes Risborough, review of employment sites and a review of the Green Belt with the other Buckinghamshire Authorities. • Having assessed our need and the supply of sites we have identified that we are not able to meet all of our needs. • Through the Duty to Co-operate we have worked with the Buckinghamshire authorities to agree a housing and economic growth distribution across the County and we now have a Memorandum of Understanding with Aylesbury Vale District Council who has agreed to include our unmet need in their local plan.
<p>How have you engaged with service users/members of the public/staff?</p>	<p>Early engagement has been conducted with other Council services, as well as key delivery partners such as Buckinghamshire County Council, the Environment Agency, Highways England, etc. at each stage of the plan's preparation.</p>



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e.g. staff forums, consultations, questionnaires etc.

The 2011 Localism Act places on local authorities a Duty to Cooperate with neighbouring authorities and key agencies on strategic issues. Very extensive work has been undertaken with these stakeholders to identify, work through and resolve cross-border strategic issues, including housing provision and provision for Gypsies and Travellers.

Extensive public consultation has been undertaken so far on the development of the new local plan, as development will affect everyone in the areas where it is delivered.

Procedures for consultation on Local Development Plans documents are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council has ensured that the production of the new local plan is in line with these regulations, and in many respects, goes beyond them.

The document has also been prepared in line with the revised Council's Statement of Community Involvement, which was adopted by the Council in December 2012.

The following consultations have been undertaken:

- Winter 2012 – initial public consultation scoping out issues and sites options.
- June / July 2012 – A series of community conversations were held across the District, to allow community stakeholders to debate about their local issues. This involved a series of workshops where members of the public and local representative could attend and discuss what the plan ought to address in each of their areas.



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- February 2014 – Public consultation on the “Wycombe District Local Plan Options Consultation Document”.
 - A 6 week exhibition in High Wycombe library.
 - 6 staffed exhibition days and evening workshops in the 6 areas of the District (High Wycombe, Marlow, Princes Risborough, Chepping Wye Valley, North West Chiltern, South West Chiltern).
 - Officers attending a wide range of other public meetings, including those organised by town and parish councils and local interest groups.
- Summer 2015 – further meetings to discuss proposals for Junction 3A and the release of the Reserve Sites.
- Late 2015 – Cabinet decision to release the Reserve Sites for development, and establishment of Reserve Sites Liaison Groups to work on development briefs for the 5 sites (these are still proposed as allocations in the Local Plan).
- February 2016 – Draft Princes Risborough Town Plan consultation which included exhibitions and market stall. Prior to this consultation there had been a number of exhibitions and meetings to discuss the emerging proposals, since February 2014. A steering group was established in 2015 to guide the proposals.
- June-August 2016 – Consultation on the Draft Local Plan which included exhibitions in High Wycombe, Hazlemere, Bourne End and Marlow.

Key groups included within the consultations include:

- Those who live and/or work in the district
- Princes Risborough residents in particular when the consultation has focused on the town expansion
- Parish and town councils, and local ward members (District & County)



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- Resident and amenity groups
- Professional service users – landowners, developers, land agents, planning agents
- Service providers – County & District Local Authority service providers, public sector bodies, strategic transport providers
- Statutory consultees including national, regional and local government bodies
- Duty to Cooperate bodies – organisations/stakeholders that we statutorily must consult, as per the 2011 Localism Act

During previous local plan consultations an extensive database of consultees (including statutory consultees) has been developed which is used as the basis for contacting stakeholders and interested parties at each round of consultation. It is updated regularly on an on-going basis. Parish and town councils and community and amenity groups are also used to promote consultations.

Publicity of the last consultations and proposals was undertaken through the distribution of a summary leaflet on the options consultation in 2014, and again on a booklet in June 2016, to 72 000 households and 4000 businesses, through local newspaper coverage, public exhibitions and events. A similar publicity method was used during the consultation on the draft Princes Risborough town plan in February 2016.

The Council website has also been developed over the last 3 years to be more customer focused / generally more public-friendly. This reflects a corporate strategy to engage better with customers and the public in general. A new local plan landing webpage has been developed where all the relevant consultation materials, response forms, events, FAQs etc. can be viewed and downloaded.



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Hard copies of the consultation materials have each time also been made available to view at the Council offices in High Wycombe, area information centres in Marlow and Princes Risborough and at local libraries across the District.

Both the consultation leaflet and main consultation document in 2014 and 2016 offered translation facilities into Urdu and Polish.

A Twitter account was created in 2014 to further promote the new local plan work and increase our presence in social media, and in particular appeal to a younger population.

We also staffed a 'pop up' event in Eden shopping centre, using video boxes to encourage people to have their say, 13 to 15 March 2014.

Initial contacts have also been made with the Youth Council, via Wycombe Youth Action (July 2013). A meeting was also held in January 2014 with WDC colleagues to find out how to engage with hard to reach groups and with young people.

In parallel to the Options consultation, we commissioned QA research prior to / during the Options consultation on the emerging local plan to conduct:

- 3 focus groups, to get a greater qualitative understanding of the issues/perceptions around places / planning for future generations; one of these was attended by young people only
- A quantitative postal survey, to obtain a representative sample of views on the new local plan proposals

Alongside the Local Plan and Princes Risborough Town Plan process, a very extensive engagement programme was created in 2014/2015 for the development of



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	<p>the Reserve Sites; for each site, a local Liaison Group made of members and local residents' representatives was created to scrutinise the development briefs being prepared for each site. A separate group was created to act as Infrastructure Roundtable.</p> <p>Following each phase of engagement, the Council has produced a consultation report summarising the representations received, which has informed the next stages of technical work and policy revisions. This can be found on our webpage www.wycombe.gov.uk/newlocalplan (under the what have we done so far link)</p>
<p>Is the responsibility for this strategy/policy/procedure shared with another service/organisation/agency?</p>	<p>The Council is responsible for the production of the local plan, the delivery of sites allocated within the new local plan will mainly be undertaken by private developers. Supporting agencies for delivery include:</p> <ul style="list-style-type: none"> • Buckinghamshire County Council • Highways Agency • Public transport providers • NHS • Registered Providers. • Other public service/utilities providers <p>As part of the Development Plan, the New Local Plan will guide how and where services are delivered throughout the District to 2033. Service providers should have regard to the Development Plan when planning for the delivery of services.</p>
<p>Is further consultation/research or data collection planned or required?</p>	<p>We have reviewed our evidence base following the draft plan consultation. The Housing and Economic Needs Assessment in particular has been updated to reflect the latest national projections data.</p>



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If so, what is the aim of the research?
Why is it needed?

The plan will be subject to a statutory 6 weeks consultation (the Publication stage) before being submitted for independent examination. During the examination, the Examiner will need to assess whether the Plan is legally compliant as well as whether it is a sound plan.

The Examiner will then issue a report advising whether the plan, subject to any modifications, can be adopted. The Council will consult on modifications then adopt the plan.



Stage 3 – Impact Assessment & Analysis

Areas to consider	Impact Identified Y/N	Description of impact and likelihood of occurrence (positive, negative, no impact; high/medium/low likelihood)
<p>Protected Characteristics (i.e. age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion & belief, sex and sexual orientation)</p>	Y	<p>Overall: Planning judgement is required to ensure that development within the district is sustainable and balances demands for housing, employment and services for all. This may require the provision of one type of infrastructure over another in certain locations in order to provide for sustainable development.</p>
	Y	<p>Age: Consideration is being given to the housing requirements (including accommodation type) of an ageing population through the Housing and Economic Development Needs Assessment. This is reflected in the housing mix proposed in the Plan.</p>
	Y	<p>Race: consideration has been given to the needs of BME communities through the market research exercise undertaken as part of the consultation. The plan ensures the protection and provision of community facilities to meet locally identified needs.</p> <p>In addition the accommodation needs of the gypsy, traveller and travelling showpeople communities have been assessed, and different approaches to how those needs could be met have been consulted on. The plan seeks to ensure that before a site is lost, a suitable replacement needs to be provided. The plan sets out a criteria based policy for the location of new accommodation, in line with national policy.</p>



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		<p>The plan however seeks to restrict any further plots or pitches for travellers in an area in the north of the district centred around the settlement of Marsh, due to the existing concentration of pitches in the locality. This may be considered as an equality issue in the sense that if a household were to form in the area, it would not be possible for that new household to stay within the area. However, the Council's justification for restricting further development stems from national policy. It is stated in government policy that in plan-making: "When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community" (Planning Policy for Traveller Sites (PPTS), Policy C para 14 page 4).</p> <p>One of the purposes of the Local Plan is to provide increased clarity and certainty for both developers and communities. This has been noted in particular in the area in and around the settlement of Marsh in the north of the District. This is an area where an approximately equal number of permanent dwellings and traveller pitches are dispersed across roughly 3 square kilometres of countryside. It is considered that any additional traveller sites in this particular area would potentially begin to dominate the settled community and would therefore be contrary to both the proposed Local Plan policy and government guidance.</p> <p>The PPTS 2015 changed the definition of travellers to exclude those who have permanently ceased to travel. This does not remove the protection</p>
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	Y	<p>afforded by the Equalities Act 2010 to Gypsies and Travellers in relation to their ethnicity and cultural preferences.</p> <p>As a result, in relation to non-travelling travellers we are proposing to accommodate them by applying the same criteria based approach used for travellers who meet the new legal definition set out in PPTS (2015), to meet their “right to claim culturally appropriate accommodation”. If we were simply to say that as they have ceased to travel they should be accommodated in brick and mortar with the settled community, we would fail under the Public Sector Equality Duty.</p> <p>Disability: Accessibility is a key planning consideration. The Government Select Committee has recommended that local authorities should adopt optional standards; the National Planning Practice Guidance has been revised to encourage local authorities to adopt optional standards where this is justified by an evidential need. The Plan requires all new dwellings to meet Category 2 (adaptable homes) standard in Part M of the Building Regulations. Part M contains 3 categories of accessible dwelling:</p> <ul style="list-style-type: none">• Category 1: Visitable dwellings – Mandatory, broadly about accessibility to ALL properties• Category 2: Accessible and adaptable dwellings – Optional, similar to Lifetime Homes• Category 3: Wheelchair user dwellings – Optional, equivalent to wheelchair accessible standard. <p>To meet the more limited need for Category 3 dwellings without creating a disincentive for small developers a threshold is proposed in parallel to the threshold for affordable housing. Delivering the overall requirement</p>
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	Y	<p>identified in the Housing and Economic Development Needs Assessment from only a portion of all new housing will therefore require a higher proportion of category 3 dwellings from the schemes above the threshold.</p> <p>Other standards or guidance will also dictate how disability issues in the built environment are addressed. For example the residential design guide, which has been adopted as a Supplementary Planning Guidance, refers to making ground floor flats accessible to a wide range of people such as elderly or disable people.</p> <p>Gender – The quality of the built environment, and the location of services relative to the home tends to affect women differently to men as it is still women who predominantly do the ‘home making’ duties of taking children to school, the doctor, and of doing shopping, and, in single car families, can be more reliant on public transport. The plan aims to locate development in the most sustainable places of the District. At Princes Risborough in particular, where the single largest development of the District is being planned, the concept plan has been developed following the urban design principles of walkable neighbourhoods. Women are also often more concerned than men about safety and security in using the built environment. The inclusion of policies on achieving quality new developments with good levels of natural surveillance addresses this potential issue.</p> <p><i>Not applicable:</i></p>
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	N	<p><i>Gender reassignment, ,Sexual orientation, marriage / civil partnership, Pregnancy / maternity, Religion/Belief</i></p> <p>Further technical work (e.g. in the form of Supplementary Planning Documents) might be developed in the future if required to contribute to understanding and taking account of / responding to the needs of the protected characteristics.</p>
<p>Other relevant groups (e.g. low income, ex-armed forces personnel, homeless people etc.)</p>	Y	<p>Low income: extensive work has been carried out to understand the district's population's needs in terms of affordable housing, and how much new affordable housing might viably be provided on new development sites. Work has also been undertaken to understand the future need for accommodation for students and the role that Houses in Multiple Occupation play in the housing market, and the impact this form of housing can have on areas of family housing. Economic work has highlighted the need to provide new economic development opportunities in the District, the variety of which could benefit those on low incomes.</p> <p>Whilst low income is not a protected characteristic, it can have an impact on many of those falling under a protected characteristic. For example, older or younger people may well have a lower income than the middle aged population, and people with disabilities are more likely to be out of work or paid less than the general population, as are those from an ethnic</p>



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	Y	<p>minority background. And, currently, there are more single mothers than single fathers and this may mean a lower income.</p> <p>Homeless people: Whilst the local plan cannot address homelessness directly, housing provision, and provision of affordable housing to meet the identified needs contributes to reducing this issue. Affordable housing national definition has changed over the years and includes social housing as well as affordable (80% of the market value). Market prices are the main issue to be tackled, which is mainly outside of the local plan.</p>
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NB. Please note that when considering impacts in relation to marriage & civil partnership - the duty is solely to ensure that there is no unlawful discrimination against this protected characteristic.



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Stage 4 - Equalities Improvement Plan

Protected Characteristic/Other relevant groups	Impact Identified Y/N	Measures identified to reduce/mitigate impact (Also include all positive actions included in your proposals)	Review date	Review update/ monitoring comments	Officer/Service Responsible
Age	Y	<p>Mitigations</p> <ul style="list-style-type: none"> • By planning for the right level of affordable housing, more young people (often on lower income or without a large capital to buy) will be able to access the property ladder and buy a home • By providing specialist accommodation for the elderly, these households will be able to have access to homes appropriate for their specific needs <p><i>Limits</i> If housing (for the elderly, or for students for example) is provided for on existing/previous employment sites then this could reduce the opportunities for jobs in that area.</p>	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP4 (3a) & (3b))	Planning Policy



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		If the provision of care homes / housing for the elderly is undertaken on a site, this may be in lieu of the provision of affordable housing which may impact on those on low income.			
Disability	Y	<p>Mitigation</p> <ul style="list-style-type: none"> • Ensuring the delivery of accessible and adaptable dwellings for disabled residents • By providing appropriate housing for people of differing abilities, people will be able to stay in their homes for longer • Ensuring accessibility to services & facilities such as public transport, GP surgeries, schools • Planning for the provision of infrastructure to meet housing needs <p><i>Limits</i> The full costs of fully accessible options (such as low-floor buses) may not be viable.</p>	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP4 (3a), CP2 (1b) &(1c)); and CP2 (2)	Planning Policy



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Race	Y	<p>Mitigation</p> <ul style="list-style-type: none"> • Planning for the provision of community infrastructure to support community cohesion • Planning to provide for the needs of the gypsy, traveller and travelling showpeople community. In relation to the Marsh area, monitoring how many households form which would require provision within the area. 	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP7, and CP4 (3c))	Planning Policy
Gender	Y	<p>Mitigation</p> <p>Likely to have better local provision of infrastructure services close to residential areas, such as schools and doctors surgeries</p>	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP2 (1b) & (c))	Planning Policy

Area of Consideration	How are/will we work to: (Also include all positive actions included in your proposals)	Review date	Review update/ monitoring comments	Officer/Service Responsible
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Eliminate discrimination, harassment & victimisation	By meeting the housing need of elderly or disable people through specialist accommodation and by providing for gypsies and travellers need	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP4 (3a), (3b) & (3c))	Planning Policy
Advance equality of opportunity	Providing affordable housing will advance equality of opportunity in terms of access to property. Policies protecting community facilities will ensure that existing needs continue to be met.	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report.(CP4 (3a) and CP7)	Planning Policy
Promote good relations between groups (including community cohesion)	The local plan aims at addressing the needs of all. By creating high quality places where people enjoy to live, work and visit, the plan contributes to community cohesion. By designing safe places, the plan helps with designing out crime and fear of crime.	Next Monitoring Report	Monitoring of the Local Plan policies is undertaken in the Wycombe Monitoring Report (CP9 – 12)	Planning Policy

NB. Please note that when considering impacts in relation to marriage & civil partnership - the duty is solely to ensure that there is no unlawful discrimination against this protected characteristic.



Appendix 1 – Quick Reference Guide

For full guidance and further suggested reading please refer to documents located under the Corporate Equalities tab on WySpace. Documents include ‘Completing an Equality Impact Assessment.’ Below are a list of the key terms and definitions:

Protected Characteristics

There are 9 specified Protected Characteristics as listed below:

Age – to include all age groups

Disability – a person is considered to have a disability if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities. People with progressive illnesses such as cancer, multiple sclerosis (MS) and HIV are considered to be disabled from the point of diagnosis.

Gender Reassignment – any person, who has undergone, is undergoing or is considering gender reassignment. A person does not need to be seeing a doctor or under medical supervision to be covered by the Act.

Sex – both men and women are covered.

Maternity & pregnancy – the Act applies during a woman’s pregnancy and any statutory maternity leave.

Marriage & civil partnership – for both marriage and civil partnerships, the PSED only extends to ensuring that due regard is given in relation to eliminating discrimination.

Race - this includes all ethnicities, races, colours, national origins as well as nationalities. This includes Roma & Traveller communities as well as refugees/migrants.

Religion and belief (including no belief) – Religion refers to any religion with a defined structure and belief system. Belief refers to any religious or philosophical belief. The Act also provides protection for those with no belief (e.g. agnostic/atheist).

Sexual Orientation - the Act protects heterosexual, homosexual and bisexual people.



Types of Discrimination

Direct Discrimination occurs when a person in the same situation as others is treated less favourably because of a protected characteristic they have (or are thought to have – perceptive discrimination) e.g. their age, race, sex etc.

Indirect Discrimination occurs when a condition or requirement, although applied equally, excludes, penalises or treats a person less favourably because of their race, disability etc.

Institutional Discrimination is the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin (taken from the *MacPherson Report, 1999*).

Harassment is defined in the Equality Act as ‘unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating and intimidating, hostile, degrading, humiliating or offensive environment for that individual.’ In deciding whether harassment has occurred the following must be considered; the perception of the person; the other circumstances of the case and whether it reasonable for the conduct to have that effect.

Victimisation is defined in the Equality Act as treating someone badly because they have done (or you believe they are going to do) a protected act. These include making a complaint of discrimination and helping someone else make a claim. NB The less favourable treatment does not need to be linked to a protected characteristic.

Associative Discrimination - This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.



Quick Guide to the Stages

Stage 1

The questions in this section are there to help you decide whether a full EIA should be undertaken. The questions should also help you to decide whether you have all the relevant information needed and if not, what further data/research is required to continue with the EIA.

Stage 2

Stage 2 is to help you consider the policy/strategy/service under assessment, analyse the data available, highlight areas requiring further research as well as encourage you to consider how equalities (across all strands and including community cohesion) is, in broad terms, relevant and/or impacted by this policy.

Stage 3

Within Stage 3, all protected characteristics should be considered and the Officer should consider each group individually to see if the policy/strategy/service will have an impact. Additionally, the Officer must consider the impact in relation to advancing equality of opportunity and promoting good relations between groups (including community cohesion). It is important that **active consideration and thought** are given to ensure that all possible impacts (negative, positive and no impact) are considered and thought is given to the likelihood of these impacts occurring.

Stage 4

Stage 4 comprises of two action plan tables. In the first table any impacts identified in Stage 3, need to be considered and the steps/actions that are to be taken to mitigate or reduce these impacts, or if positive impacts are required and necessary how these are to be sustained, are to be documented. In addition, the second table requires Officers to consider how the policy/strategy/service under assessment will impact on any of the three main PSED duties and what positive steps could be taken.

These steps need to be concise, measureable and have a realistic timeframe for completion alongside the name of the Officer and service responsible for the action plans. Additionally, there is a requirement for a review date and space for updates to be input into this table to show continuous monitoring and action planning in relation to the required steps.

Continuous monitoring and improvement can include consideration of how actions implemented will be measured, how any results will be analysed and over what time period will the actions/results be reviewed.