

Appendix 5 - H&F Equality Impact Analysis Tool



Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	23/24 – Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>Avonmore Primary School - Redevelopment</p> <p>The proposed scheme, co-produced with the Avonmore school governors and community and local residents will see the redevelopment of the site, which currently accommodates Avonmore Primary School, a one form entry school (1FE), together with nursery and limited Special Education Needs and Disabilities (SEND) facilities.</p> <p>The proposed development will look to provide a new modern fit for purpose one form entry (1FE) Primary School for 30 pupils in reception to year 6, with complementary nursery accommodation and enhanced SEND facilities throughout and 91 new modern homes, 50% of which will be affordable.</p> <p>The quality of the scheme has been maximised; with both the new modern school facilities and new residential homes all designed to be built to high sustainability and environmental standards helping to reduce running and energy bills to the school, users and new residents. A full planning application for the proposed scheme will be submitted in October 2023.</p> <p>The construction phase may well have a substantially different impact on those with protected characteristics than the impacts of the development once completed. The impact of the construction phase is anticipated to primarily affect immediate neighbours, visitors, residents, and employees.</p> <p>The construction contractor will be obliged to observe LBHF policies on Equality and Diversity or to provide their own policies for approval as part of the tender process, prior to appointment. The construction contractor may also be asked to sign up to a code of conduct to mitigate against impact of its work on persons with protected characteristics.</p> <p>Upon appointment, the main contractor will be required to produce a Construction Management Plan and a site waste management plan – that will control site logistics and ensure that locals are disturbed as little as possible by the construction works traffic. It is expected that the hours of work on site will be controlled by planning condition.</p> <p>The completed development may have a substantial positive impact or at the very least no negative impact on some or all persons with protected characteristics. The scheme will deliver 91 homes (including affordable), with the breakdown as follows:</p>

	Description	Social Rent	Shared Ownership	Private Sale	Total
	TOTAL	27	18	46	91
	<p>10% of the homes will be wheelchair accessible.</p> <p>The completed development is anticipated to have a positive impact on residents with protected characteristics and others who are of low and mid-income households through the delivery of inclusive development that includes significant number of affordable homes.</p> <p>The scope of this EQIA assessment is primarily to consider and assess the impact from Avonmore Primary School's redevelopment over two distinct phases: construction phase and the completed development</p>				
	<p>Name: Peter Cook Position: Head of Development Email: peter.cook@lbhf.gov.uk Telephone No:</p>				
Date of completion of final EIA	Initial assessment completed on 11 September 2023				

Section 02	Scoping of Full EIA		
Plan for completion	Timing: The EIA scope starts immediately through to anticipated completion of the final construction phase due autumn/winter 2026.		
Analyse the impact of the policy, strategy, function, project, activity, or programme	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.		
	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral

	Age	<p>Construction phase (including pre-construction handover stage):</p> <p>The site is currently occupied by Avonmore Primary School with the staff overseeing governance and safeguarding principles. The school will be vacated in summer 2024 before construction commences later in the year. It will need to be secured by appropriate fencing and by remote CCTV system with a 24-hour emergency response arrangement in place. Empty or inactive construction sites by their nature attract the curiosity of younger people who may attempt to enter and explore them. To mitigate against this, continuous security will be maintained especially during the period before the construction contractor takes possession of the site. The impact is anticipated to be neutral but only on the full implementation of identified mitigations.</p> <p>The Council’s Construction Site Noise and Dust Pollution policy will mitigate against impact of the construction phase, but it mainly focuses on issues around noise, vibration and dust. It will nevertheless deal with the wider impact of the construction as part of the approval of the Construction Phase Plan which will form part of a pro-active and collaborative approach backed up by active monitoring and enforcement to ensure compliance so as to control or eliminate any negative impact from the construction site on local residents and businesses.</p> <p>In addition to planning requirements, the council will set out clear contractual expectations on the construction contractor as part of its Employer’s Requirements to ensure the contractor engages with neighbouring residents / stakeholders, in accordance with the best practice requirements.</p> <p>The construction phase is anticipated to have a positive impact on younger and unemployed residents who will be offered apprenticeships, employment and training during the construction phase. The anticipated positive impact on younger people is in acknowledgement of younger people experiencing higher unemployment rate in comparison to all other working age groups. Offer of apprenticeships, employment and training will be a significant part of the contractor’s social value offering or S106 obligations.</p> <p>Due to the location of the site in close proximity to residential areas, it is possible</p>	N

	<p>that noisy works, even though they may still be within statutory limits, may have a disproportionately negative impact on younger people especially during exams and revision times as the construction phase is anticipated to be longer than 1 year.</p> <p>The contractor would be required to work with residents around the site and organise work on site in close liaison with residents to mitigate disproportionate impact especially during exams and revision times.</p> <p>Footpaths alongside the site provide access to Marcus Garvey Park and the play equipment therein. Alternative routes will be accessible and will be well signposted. The impact is anticipated to be neutral but only on the full implementation of identified mitigations.</p> <p>Completed Development Phase</p> <p>The completed development will have a positive impact on households and individuals with protected characteristics and others who are of low- and mid-income households by delivering affordable housing.</p> <p>There will be a disproportionate positive impact on younger households because the new 1FE school, including enhanced SEND and nursery facilities, and because younger households have a proportionately lower income, and this development will disproportionately benefit them by delivering affordable housing.</p> <p>All units will be either wheelchair accessible / adaptable (M4(3)) or accessible and adaptable (M4(2)), which will disproportionately benefit older people, who are more likely to have age-related impairments.</p> <p>New amenities within the school will include play space for children and young people.</p> <p>Lighting within the development will be site-wide, creating a greater sense of safety, which will benefit older people and young people, who may feel more vulnerable when outside in the dark.</p>	
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	Disability	<p>Construction Phase</p> <p>Temporary closure of some footpaths alongside the site due to statutory undertakers' works often creates barriers that disproportionately negatively impact disabled people. Closure, if required, will only take place once alternative routes that are accessible, sufficiently wide and appropriately designed and installed with appropriate signpost are made available.</p> <p>Specific obligations on the contractor to carry out required Health and Safety measures in relation to temporary works will be included in the contract with the construction contractor. Works will be monitored, inspected and overseen by council's consultants.</p> <p>The production of dust during construction phase will create a disproportionate negative impact on disabled people with breathing conditions. Implementation of the council's Construction Site Noise and Dust Pollution policy which seeks to control levels of dust by its inclusion of enforceable requirements on the contractor to implement dust suppression measures will help mitigate against this issue.</p> <p>The impact is anticipated to be neutral but only on the full implementation of identified mitigations.</p> <p>Completed Development Phase</p> <p>All units and their approaches will be either wheelchair accessible / adaptable Building Regulations ADM (M4(3)) or accessible and adaptable (M4(2)) as a minimum, which will disproportionately benefit disabled people.</p> <p>Accessibility and inclusiveness of the design have been some of the core principles underpinning the design brief from the start. All buildings, approaches and scheme amenities will meet the requirements of required planning policy and design standards, including Building Regulations ADM and BS 8300.</p> <p>Amenities within the new school will include play space for children and young people, which will be designed to be inclusive and have specific inclusive play</p>	

		pieces. Scheme facilities provided will be inclusively designed, disproportionately benefitting disabled people.	
	Gender reassignment	<p>Construction Phase</p> <p>The development is not anticipated to have any impact on people with this protected characteristic during this stage.</p> <p>Completed Development Phase</p> <p>Lighting within the scheme amenities will be to a secure by design standard, this will create a greater sense of safety, which will benefit trans and non-binary people, who may feel more vulnerable when outside in the dark due to the risk of hate crime.</p>	
	Marriage and Civil Partnership	<p>Construction Phase</p> <p>The construction stage is not anticipated to have any impact on people with this protected characteristic.</p> <p>Completed Development Phase</p> <p>The completed development is not anticipated to have any impact on person with this protected characteristic.</p>	
Pregnancy and maternity	<p>Construction Phase</p> <p>Temporary closure of some footpaths alongside the site due statutory undertakers' works often creates barriers that disproportionately negatively impact persons with this protected characteristic. Closure will only take place once alternative routes that are accessible, sufficiently wide and appropriately designed and installed with appropriate signposting are made available.</p> <p>Specific obligations on the contractor to carry out required Health and Safety measures in relation to temporary works will be included in the contract with the construction contractor. Works will be monitored, inspected and overseen by council's consultants.</p>		

		<p>The production of dust during construction phase will create a disproportionate negative impact on persons with this protected characteristic with breathing conditions. Implementation of the council's Construction Site Noise and Dust Pollution policy which seeks to control level of dust by its inclusion of enforceable requirements on the contractor to implement dust suppression measures will help mitigate against this issue.</p> <p>The impact is anticipated to be neutral but only on the full implementation of identified mitigations.</p> <p>Completed Development Phase</p> <p>There will be an inclusively designed estate amenities – both in the housing and school elements - that will disproportionately benefit new mothers, who are likely to be using pushchairs.</p>	
	Race, Religion or belief (including non-belief)	<p>Construction Phase</p> <p>The construction stage is not anticipated to have any impact on people with this protected characteristic.</p> <p>Completed Development Phase</p> <p>Some BAME communities have a proportionately lower income, and this development may disproportionately benefit them by delivering affordable housing.</p> <p>Lighting within the scheme amenities will be to a SBD standard, creating a greater sense of safety, which will benefit BAME people and people from some religious communities, who may attend religious places very early in the morning or late in the evening and so may feel more vulnerable when outside in the dark.</p>	
	Sex	<p>Construction Stage</p> <p>Historically, construction sites were synonymous with inappropriate behaviour including female passers-by receiving un-wanted and inappropriate attention. Additionally, during the construction stage some site workers may operate at</p>	

		<p>heights that may give rise to privacy issues. This is not helped by the fact that the construction industry is one of the most gender-segregated or male dominated industries.</p> <p>The council will set clear expectations on the contractor that are contractually enforceable including taking immediate steps to report and investigate any incident of an unacceptable conduct of its employees or sub-contractors and ensure the site is registered under, and operate in accordance with, the Considerate Contractor Scheme.</p> <p>Completed Development Phase</p> <p>The development is not anticipated to have any negative impact on persons with this protected characteristic. It may have indirect positive impact through the provision of family sized homes to families in overcrowded accommodation to alleviate overcrowding and sibling of different sexes sharing rooms.</p> <p>There will be an inclusively designed scheme amenities offering that will disproportionately benefit women, who on average spend more time taking on caring responsibilities for their children and / or older relatives than men.</p> <p>The lighting within the scheme amenities will be to a SBD standard creating a greater sense of safety, which will benefit women, who may feel more vulnerable when outside in the dark.</p>	
	Sexual Orientation	<p>Construction Stage</p> <p>The construction stage is not anticipated to have any impact on people with this protected characteristic</p> <p>Completed Development Phase</p> <p>The lighting within the scheme amenities will be to a SBD standard, creating a greater sense of safety, which will benefit LGBTQIA+ people, who may feel more vulnerable when outside in the dark due to the risk of hate crime.</p>	

	<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>
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Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	The requirement for proportionate of Bedroom numbers for social rent on this scheme is a Council Planning Policy.
New research	New research may be required to establish or update Local Letting Policy to understand any changes in the Bedroom numbers required for future schemes (for example).

Section 04	Consultation
Consultation	<p>A series of targeted public engagement activities have taken place to present the proposed plans to local residents, stakeholders, including the school's community to gather their feedback to co-produce the design proposals.</p> <p>Residents and the school's community have been kept informed via online and in-person public exhibitions, newsletters, flyers/invitations letters, emails to those on the mailing list, door-knocking, meetings with stakeholders and digital promotion on our project website</p>
Analysis of consultation outcomes	<p>Residents and the school's community have been able to give feedback on the design proposals in person, online and at public exhibitions where updated designs were presented and feedback from previous stages was summarised.</p> <p>Resident feedback influenced; the height and massing of the proposed residential blocks, the internal layouts and screening on some balconies to resolve potential overlooking issues, and the landscaping design of the perimeter boundary to address security concerns.</p>

	A Statement of Community Involvement will be prepared as part of the planning application which will demonstrate consultation and co-production from the start of the project.
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Section 05	Analysis of impact and outcomes
Analysis	<p>The sections above refer to mitigation procedures adopted where a negative impact could be identified. Mitigations identified in this assessment must be adopted to mitigate against identified risks. Additionally, regular review of impacts and mitigations adopted must take place that considers and analysis realisation of foreseen impacts, rise of any unforeseen impact as well as the success of mitigations adopted. The outcome of these reviews would be incorporated into this Equality Impact Assessment.</p> <p>Based on this initial assessment, the project may proceed subject to the recommendation below as no significant disproportionate negative impacts were identified.</p> <p>Recommendations: A clear mitigation action plan to be created specifying a detailed monitoring process to record successful implementation of mitigations identified in this assessment and track actions taken as well as any unexpected or new disproportionate impact identified and any new mitigation that may need to be implemented.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	As part of the Employer's Requirements, the construction contractor must maintain and enforce security over the construction site to prevent any unauthorised access to the site, any potential mitigation strategies post completion will be reviewed and agreed by Officers during the construction stage.

Section 07	Action Plan					
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan

Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Matt Rumble Position: Strategic Head of Regeneration& Development Email: matt.rumble@lbhf.gov.uk Telephone No: 07786 747488 Considered at relevant DMT: Economy
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: XX / 01 / 2024 Key equalities issues have been included: Yes
Equalities Advice (where involved)	Name: Position: Date advice / guidance given: Email: Telephone No: