

## HDC Due Regard (Equality Analysis) Template

## Appendix 3

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

For help with this template please view the guidance document, which contains advice to assist you when you are considering the impact (both positive and negative) of the proposed actions on each of the protected equality characteristics.

**Name of policy/procedure/function/service being analysed: Statement of Community Involvement**

**Department and section: Strategic Planning**

**Name of lead officer: Tess Nelson**

**Other people involved (assisting or reviewing – including any service users or stakeholder groups etc.): None. (N.B. Draft revised SCI prepared internally, with internal consultation. Public consultation will follow once Cabinet / Council approval obtained)**

**Date assessment completed: September 2019**

### Step 1: Defining the policy/procedure/function/service

Is this a new, amended or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

Review of previous Statement of Community Involvement (SCI) adopted March 2015.

The aim of the review of SCI is to meet the legislative requirement to undertake a review every 5 years. The purpose of the review of the SCI is to amend Council practices to ensure they accord with the statutory consultation requirements set out in legislation.

The main activity of the SCI is to set out how parties with an interest in planning issues in the district (incl. Planning policy, Development management and Neighbourhood planning) can engage with the planning system. The SCI affects the whole community of the district including: individuals; businesses, groups / bodies representing them and stakeholders serving the area. It covers all sections of the community, including those with protected equality characteristics, living in all parts of the district.

The expected outcome of the SCI is that the wider community understands when, how and who the Council will consult with on planning matters and how they can get involved.

**Step 2: Data collection & evidence**

What relevant evidence, research, data and other information do you have and is there any further research, data or evidence you need to fill any gaps in your understanding of the potential or known affects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

The SCI is informed by knowledge of the characteristics of the districts population and business community as set out in the Spatial Portrait (Local Plan Appendix D), Sustainability Appraisal Report (Part 1 Scoping, Chapters 6 &8) and Settlement Profiles, all available on the Council's website. The evidence for the Local Plan tells us about the housing and economic needs of the district and that Harborough has an aging population (with an older demographic than England) and a lower proportion of people from ethnic minority communities. As a mainly rural district, it also has issues relating to access to services for those without their own transport which can lead to isolation for many groups.

We have some quantitative data on the number / type of respondents who engage with the Council on planning policy matters and retain responses received on each planning application.

We also have past experience and anecdotal information on customer's experience of recent consultation exercises to guide future practice.

The SCI sets out the framework for consultation and undertakes to use appropriate, fit for purposes and cost efficient consultation techniques and methods which take account of the differing skill levels and abilities of the community. Consultation on individual policy documents may be tailored to suit the specific focus of a document being consulted upon or in relation to the topic or target audience likely to be impacted by the policy.

**Step 3: Consultation and involvement**

Have you consulted and if so outline what you did and who you consulted with and why.

Not yet. Once the draft revised SCI is approved by Cabinet / Council a period of 7 weeks of public consultation will take place. Consultation will be undertaken in accordance with the adopted SCI (March 2015), which was previously subject to EIA. This will involve contacting approx. 1,500 organisations and individuals on the Strategic Planning contact database, a media release / publicity via the Council's website and making the document available at locations around the district. The Council has to consult on the SCI to meet legislative requirements.

Compliance with the SCI forms part of the legal compliance tests for development plan documents. Any future development plan

document (such as a Local plan) will be examined to ensure it has been prepared in accordance with the consultation standards set out in the SCI (as well as other legal compliance tests and ‘soundness’ tests).

#### **Step 4: Potential impact**

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

The Statement of Community Involvement provides the overall framework for planning consultations and does not itself set planning policy or make a planning decision. Individual policy documents will require their own Equality Assessment as part of the plan making process and this may result in a particular need to prepare a community involvement exercise in a particular way. The SCI is however key in setting out the following messages to assist community involvement in planning decisions:

- Use of an online consultation system (planning policy) and Public Access system (development applications) to ensure that everyone can view and comment on planning proposals 24/7 including via public access computers in libraries and at the Council Offices.
- Hard copy responses will be accepted and all consultation documents will also be available to view in hard copy form at the Council Offices
- Documents will be written in a user friendly style and copies of documents in alternative formats will be available upon request. Further information is available here: <http://www.harborough.gov.uk/equality>. The Council will also aim to avoid consultations in main holiday periods but where this cannot be avoided; the time period for consultation will be extended beyond six weeks, where necessary.

#### **Step 5: Mitigating and assessing the impact**

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable

adjustments may be necessary and how any unmet needs have identified can be addressed.

There is considered to be no overall adverse equality impact of the SCI document.

**Step 6: Making a decision**

Summarise your findings and give an overview of whether the policy will meet Harborough District Council's responsibilities in relation to equality, diversity and human rights. Does it contribute to the achievement of the three aims of the Public Sector Equality Duty – eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations?

The SCI contributes to HDC's responsibilities in relation to equality, diversity and human rights by setting out an approach to making planning policy and planning application processes accessible and ensuring that responses can be made, considered and processed.

**Step 7: Monitoring, evaluation & review of your policy/procedure/service change**

What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness and make positive improvements? How frequently will monitoring take place and who will be responsible?

Report in the annual Local Authority Monitoring Report (AMR) details of progress against the Local Development Scheme (LDS) including any consultations undertaken during the past monitoring period or planned for the forthcoming monitoring period.

Record quantitative data on the number of respondents (by respondent category e.g. resident, developer / agent, statutory consultee and submission method e.g. online / email / letter) to planning policy consultations.

Continue to undertake satisfaction surveys of users of the planning application service, at the point Decision Notices are issued. Analyse data and use it to inform improvements to process and practice within the Development Management Team.

Explore the potential to collect and analyse equalities monitoring data via any online consultation system (Planning policy) or alternative consultation methods to enable a better understanding of: the profile of users, identify any gaps or barriers for particular groups and to inform future consultation practices (beyond the statutory minimum) for the planning service.

Explore the potential to collect qualitative data on people's experience of using the online consultation system or attending consultation events related to the Local Plan (e.g. conduct a satisfaction survey). Any data collection could be timed or related to the occasional cleaning of the contact database or to future consultations.

## Equality Improvement Plan

**Equality Objective :**

**Action: AMR and Consultation Statements (required by legislation) published on website.**

**Officer Responsible: T Nelson**

**By when: March 2020, ongoing.**

**Equality Objective :**

**Action: Explore the potential cost / benefits of collecting data on planning consultations to the operational effectiveness of the Strategic Planning Team and the soundness of the Local Plan for any review of the Local Plan.**

**Officer Responsible: T Nelson**

**By when: 30 September 2020**

**Equality Objective :**

**Action: Investigate means to collect equalities monitoring data, during any contract renewal or procurement process.**

**Officer Responsible:**

**By when: September 2020**

**Equality Objective :**

**Action: Record equality issues arising from consultations on planning policy documents to inform the approach to the use of any specific additional consultation methods and techniques.**

**Officer Responsible: T Nelson**

**By when: Ongoing**

**Signed off by: T Nelson**

**Date: 11 September 2019**

Once signed off, please forward a copy for publication to Julie Clarke, Equality and Diversity Officer  
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