

Equality Impact Assessment

{Hailsham Aspires Communication and Engagement
Strategy}

Commercial and Assets

PART 1 – INITIAL ASSESSMENT

<p>1. What is the aim/ objective of the area being assessed?</p>	<p>The Council have appointed external consultants Snapdragon to implement a consultation strategy and community engagement programme that supports evolving proposals for the creation of vibrant commercial and retail space, new homes and an improved town centre offering in Hailsham.</p>
<p>2. Who is intended to benefit from it and how?</p>	<p>The primary objective of the consultation process is to ascertain the views, and encourage the participation of, members of the community and stakeholders in the process of the development as early as possible. In order to achieve this, a number of activities will be put in place to attract and include as wide a demographic of responses as possible.</p>
<p>3. If your service uses contractors, do you ensure that they comply with the Council's equal opportunities policy and relevant legislation?</p>	<p>Yes. The consultants are aware of a series of policies and guides at a national and local level with which they must comply in order to engage with local authorities and the local community when bringing forward planning applications. Snapdragon have also been made aware more specifically of the Council's own Statement of Community Involvement which sets out the processes through which effective community involvement in the planning process can be delivered and emphasises the need to involve 'hard to reach' groups who do not take part in consultation through choice, circumstance or lack of opportunity. They have also been made aware that they must comply with the following Council Policies, Strategies and procedures; Corporate Equalities Objectives, Engagement strategy, Social Media Strategy & Protocol, Communications Strategy and Personal Information and Equalities Monitoring Procedure.</p>
<p>4. Do you know who your service users are by age/ race/ disability/gender etc.? (This could be obtained from results of recent consultation or surveys, equality monitoring data, demographic and other statistics).</p>	<p>We are able to obtain demographic profile of residents in Hailsham and the surrounding area using 2011 Census data, East Sussex in Figures and Acorn (licensed from CACI) datasets of households and postcodes for the geographic area.</p> <p>We also have the equality monitoring data from the results of the initial consultation undertaken between August and November 2019.</p>
<p>4. a) How are service users views gathered? (This could be through results of recent consultations or surveys, information from groups and agencies directly in touch with particular groups or analysis of complaints) b) How do you use this information? c) Do you publish the results, and where?</p>	<p>A) The outbreak of coronavirus (COVID-19) will continue to interrupt the ordinary proceedings of everyday life for the near future, impeding the ability for much face-to-face, larger scale events. As such, the communications and engagement strategy for the project will have to adapt and remain as flexible as possible. There is also an expectation to be more creative with consultation to allow projects to continue.</p> <p>The former Chief Planner at the Ministry of Housing, Communities and local Government, Steve Quartermain CBE, sent a newsletter to local Councils on how this should be</p>

undertaken, *“We ask you to take an innovative approach, using all options available to you to continue your service. We recognise that face-to-face events and meetings may have to be cancelled but we encourage you to explore every opportunity to use technology to ensure that discussions and consultations can go ahead.”*

The use of online engagement throughout the programme will be an integral tool in effectively disseminating information, consulting with stakeholders and gaining feedback from local people. These include but are not exclusive to:

- Meetings with landowners and site stakeholders,
- Updating of the existing Hailsham Aspires website to ensure easy interactivity with information,
- Creation of social media channels to increase participation,
- The use of online engagement tools to undertake surveys on a range of topics,
- Widespread advertising using a variety of channels (both online and traditional leaflets, emails, posters),
- Public exhibitions and workshops (this will incorporate a considerable non-public assembly approach following the coronavirus pandemic, including online consultation and the option for town hall style conference calls),
- Formal consultation with stakeholders,
- Meetings with residents, community groups and schools where appropriate.

b) Consideration will be given to all comments and responses received. The views and responses will help to inform the design team (architects, engineers, town planners and communications & engagement consultants) in their work to bring forward regeneration proposals for the Vicarage Field shopping area, District Council offices, the Leisure Centre and the nearby car parks, with the intention of submitting a planning application in early 2021.

c) The external consultants will produce a public consultation strategy at the outset of the project and will assess the strategy as part of the Statement of Community Involvement when the future planning application is submitted. We will ensure that all public information is given in a non-technical, accessible format and that all pertinent information is available via the project website. The results of any formal consultation will be made available on both the Hailsham Aspires and the Council's websites. We will ensure that hard copies of any piece of consultation material is available and can be posted to those that request it. All meetings, correspondence and attempts at meetings will be recorded and a paper trail kept allowing for transparency. Community meetings will have written documentation to take away to

	<p>supplement any verbal presentations given. We will utilise social media channels, the Council's existing communications tools, leaflets, press briefings, letters and press releases to report and/or direct people to the results of formal consultation.</p>	
<p>5. Could the area being assessed have a differential impact on racial groups?</p>	<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that there will be a differential impact on racial groups.</p> <p>We will utilise 'read speak' on the website in order to help those for whom English is not their first language. We will ensure that all public information is given in a non-technical, 'Plain-English' and accessible format. We will ensure that hard copies of any piece of consultation material can be made available in another language using the Sussex Consortium Translation Services.</p>
<p>6. Could the area being assessed have a differential impact on people due to their gender?</p>	<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that there will be a differential impact on people due to their gender.</p> <p>The initial consultation undertaken in 2019 showed that of those that answered the equalities monitoring questions 59% identified as female and 40% as male. We would continue to monitor this information in the continued consultation, and make adjustments if necessary to ensure a representative balance of contributions from the local community.</p>
<p>7. Could the area being assessed have a differential impact on people due to their disability?</p>	<p>YES</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>Around a third of disabled people in the UK experience difficulties in accessing public, commercial and leisure goods and services. Accessibility regulations aim to help make sure online public services are accessible to all users, including people with disabilities.</p>

			<p>We will ensure that accessibility tools are installed and available on the project website and online consultation tools, and that the project website adheres to the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. We will utilise 'read speak' on the website in order to help those who are partially sighted with easier visibility, and if their first language is not English. We will ensure that all public information is given in a non-technical, 'Plain-English' and accessible format. We will ensure that hard copies of any piece of consultation material can be made available and posted to those that request it, in large print, Braille or in another language.</p>
<p>8. Could the area being assessed have a differential impact on people due to their sexual orientation?</p>		<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that there will be a differential impact on people due to their sexual orientation.</p>
<p>9. Could the area being assessed have a differential impact on people due to their age?</p>		<p>YES</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>We know that older people are more likely to engage in consultation activities and attend public events on local matters. The initial consultation undertaken in 2019 showed lack of response from those under the age of 35. In order to increase their participation and ensure that they were aware of the consultation we ran a specific Facebook advertisement for three weeks targeted to appear on the Facebook pages of those that were aged between 16-35 years old and located within 12 miles of Hailsham. The advert tripled the number of responses we received from those aged under 35 years old.</p> <p>We also know that older people can feel left behind with the use of innovative/online consultation methods, which could be more apparent during the current Coronavirus (Covid-19) pandemic. However, it is worth noting that 48% of respondents to our consultation in 2019 told us that they heard about the regeneration project online via social media. We will continue to maintain non-digital methods of contact, such as a freephone number and a postal address,</p>

		and ensure that all materials are available in hard copy in order that those without internet access can participate in the consultation process.
10. Could the area being assessed have a differential impact on people due to their religious or other belief?	NO	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that there will be a differential impact on people due to their religious or other belief.</p> <p>The majority of places of worship have physically closed during the coronavirus outbreak. The physical closure of buildings/settings where members of these groups could have been made aware of consultation through word of mouth/meetings/posters etc. will also be impacted and therefore reduce the potential for these groups to be made aware of consultation through traditional methods. We will ensure that we put out information updates through bodies, charities, organisations and advocacy groups.</p>
11. Could the area being assessed have a differential impact on people due to them having dependants/ caring responsibilities?	YES	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>The majority of Education/Health/Social care/Support services have physically closed during the coronavirus outbreak resulting in significantly higher demands on those with dependants/caring responsibilities time and therefore the amount of available time they may have to respond or engage with consultation. The physical closure of buildings/settings where members of these groups could have been made aware of consultation through word of mouth/meetings/posters etc. will also be impacted and therefore reduce the potential for these groups to be made aware of consultation through traditional methods. We will ensure that we put out information updates through bodies, charities, organisations and advocacy groups.</p> <p>A digital consultation process may also offer those who may not have been able to participate in a physical event due to caring responsibilities the opportunity to participate in the consultation at a time that suits them.</p>

<p>12. Could the area being assessed have a differential impact on people due to them being transgendered or transsexual?</p>		<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that there will be a differential impact on people due to them being transgendered or transsexual.</p>
<p>13. Is there any evidence that people from different groups may have different expectations of the areas being assessed?</p>		<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that people from different groups may have different expectations of the areas being assessed.</p>
<p>14. Is the policy likely to affect relations between certain groups, for example because it is seen as favouring a particular group or denying opportunities to another?</p>	<p>YES</p>		<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>In light of coronavirus (COVID-19), there will be a need to move more aspects of engagement and consultation online. If measures are not adequately undertaken to ensure that those that are unable to access the internet and/or take part in on-line consultations can take part then the consultation could be seen as favouring those with access to the internet. This could result in the integrity of the consultation process and whether it has been adequately and properly undertaken being questioned. We will ensure that we put out information updates through bodies, charities, organisations and advocacy groups and maintain non-digital means of contact, such as a freephone and postal address.</p>
<p>15. Is the policy likely to damage relations between any particular groups and the Council?</p>		<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>There is no evidence available to show that the policy is likely to damage relations between any particular groups and the Council.</p> <p>We will ensure that we put out information updates through bodies, charities, organisations and advocacy groups that we recognise may not have access to or the time to use the internet.</p>

<p>16. Could the differential impact identified in 5-12 amount to there being the potential for adverse impact in this strategy/policy/service/procedure?</p>		<p>NO</p>	<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>Consultation will continue to go ahead on the Hailsham Aspires project in line with Government advice during the coronavirus (COVID-19) pandemic. This consultation will still adhere to best-practice methods and the requirements set out in local and national planning policy. We will utilise innovative online engagement tools, partnered with traditional methods to enable as wide range of participation as possible. We know from experience that traditional public exhibitions tend to attract a particular demographic profile, with increased digital engagement, there is the opportunity to capture new audiences and a more representative cross-section of the local population.</p>
<p>17. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason?</p>			<p>Please explain and provide any existing evidence (either presumed or otherwise):</p> <p>N/A</p>
<p>18. Do your staff know who the contact is for equalities issues within your directorate?</p>	<p>YES</p>		<p>Please provide evidence- what methods are used to make staff aware?</p> <p>The Council's Equalities Officer and staff members of the internal Equalities Group are available to provide advice and support to staff with any equalities concerns or issues.</p>
<p>19. Have all your staff attended an equality awareness training session?</p>	<p>YES</p>		<p>Please signpost evidence of this? What was the feedback from this training? Please list those who have not.</p> <p>All new staff complete both a Learning Pool module on Equality and Diversity (within first month) and attend a face-to-face Equalities workshop within their first year. Some new staff may not yet have attended the physical workshop (especially in the current circumstances), but will have completed some online training on joining.</p> <p>This is supplemented with other equalities training from time to time on specific topics. For example, "Promoting Gender Equality" ran in-house for a number of managers in Nov 19 and March 20. In addition, Recruiting Managers complete</p>

		online Recruitment and Selection training, which includes a section about Equality and Diversity, and alongside this, the “Unconscious Bias” Learning Pool module.
20. Have you set any equality performance indicators or objectives for your service?	YES	Please explain. To achieve compliance with the requirements of the current WDC Corporate Equalities Objectives.
21. Actions arising from Part 1 of the Initial Assessment		<ul style="list-style-type: none"> • Consultation will continue to go ahead on the Hailsham Aspires project in line with Government advice during the coronavirus (COVID-19) pandemic. This consultation will still adhere to best-practice methods and the requirements set out in local and national planning policy. We will use innovative online engagement tools, partnered with traditional methods to enable as wide range of participation as possible. • The consultants will adhere to and comply with the following Council Policies, Strategies and procedures; Equal opportunities policy, Engagement strategy, Social Media Strategy & Protocol, Communications Strategy and Personal Information and Equalities Monitoring Procedure. • We will use targeted advertising to seek to reach a younger demographic - Digital advertising is one of the most cost-effective ways of reaching a larger target audience and encouraging engagement, specific segments of the population can be targeted, based on location, age, and even interests or job title. Utilising these platforms will seek to reach a younger demographic. • We will utilise social media channels, and the Council’s existing communications tools (e.g. My Alerts) to ensure that as many people as possible, especially reaching hard-to-reach groups across the town and younger members of the community, take part in the consultation. We will monitor other community group’s social media sites such as Hailsham News & Talk Facebook page for relevant traffic and to disseminate information. • We will use traditional advertising methods such as leaflets, press adverts, letters, press releases and briefings to capture those that do not use the internet or social media. These will also be clarified with planning officers to ensure appropriate reach. • We will ensure that all public information is given in a non-technical, ‘plain-English’ and accessible format, in order that information is easy to understand and will allow stakeholders to engage in a meaningful way,

- We will ensure that we put out information updates through bodies, charities, organisations and advocacy groups that we recognise may not have access to or the time to use the internet including but not exclusive to Care for the carers, the East Sussex Seniors' Association (formerly Wealden Senior Citizens Partnership), Wealden Dementia Action Alliance, The Hailsham Community Hub at Sussex Community Development Association, Churches Together in Hailsham, Action in Rural Sussex and 3VA.
- We will ensure that accessibility tools are installed and available on the project website and online consultation tools, and that the project website adheres to the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.
- We will utilise 'read speak' on the website in order to help those who are partially sighted with easier visibility, and if their first language is not English.
- We will ensure that hard copies of any piece of consultation material can be made available in large print, Braille or in another language.
- We will ensure that hard copies of any piece of consultation material is available and can be posted to those that request it and all community meetings have written documentation to take away to clarify key messages.
- We will ensure that the timeframe for consultation is proportionate and realistic to allow enough time for people to understand the issues and respond. When a formal consultation spans over a holiday period, we will ensure that it lasts for a minimum of 12 weeks to allow enough time for voluntary or community groups and those with dependents/caring responsibilities to respond.
- We will ensure that consultation adheres to the Councils Personal Information and Equalities Monitoring procedure. We will monitor the demographic of the responses we are receiving during periods of consultation in order to identify any possible gaps in the profiles of people who have been responding so that work can be undertaken to target these groups.
- All meetings, correspondence, attempts at meetings and communication between political stakeholders and the project team will be recorded and a paper trail kept allowing for transparency.
- To ensure the integrity of the consultation process Snapdragon will produce a public consultation strategy at the outset of the project that will be assessed in the Statement of Community Involvement to be submitted with the future planning application.

22. Should this Initial Assessment proceed to Part 2?		NO	
23a. As a result of Part 1, is a Full Assessment necessary?		NO (please sign below)	23b. If Yes, on what evidence should this assessment proceed to a Full Assessment?
24a. Date on which Full Assessment to be started by			24b. Date on which Full Assessment to be completed by

EQUALITY IMPACT ASSESSMENT Part 1 & 2

Directorate	Community and Customer Services	Service Commercial and Assets	Assessment carried out by	Charlotte O'Callaghan		
Area being assessed	Hailsham Aspires Communication and Engagement Strategy		Date of Assessment	30/06/2020	Is this a new or existing service/policy?	New

Signed (Completing Officer): Charlotte O'Callaghan Signed (Lead Officer): Gill Cameron-Waller Date: 30/06/2020