

Wiltshire Housing Site Allocations Plan

Submission draft plan

Equalities Impact Assessment

May 2018



Wiltshire Council

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如果有需要我們可以使用其他形式(例如:大字體版本或者錄音帶)或其他語言版本向您提供有關威爾特郡政務會各項服務的資訊,敬請與政務會聯繫,電話:0300 456 0100, 文本電話:(01225) 712500,或者發電子郵件至:customerservices@wiltshire.gov.uk

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ولٹھا ٹرکونسل (Wiltshire Council) کی سروسز کے بارے معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (چیسے کہ بڑی چھپائی یا آؤیو ہے) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے 712500 (01225) پر رابطہ کریں یا دین دوسری دیستان customerservices@wiltshire.gov.uk

Na życzenie udostępniamy informacje na temat usług oferowanych przez władze samorządowe hrabstwa Wiltshire (Wiltshire Council) w innych formatach (takich jak dużym drukiem lub w wersji audio) i w innych językach. Prosimy skontaktować się z władzami samorządowymi pod numerem telefonu 0300 456 0100 lub telefonu tekstowego (01225) 712500 bądź za pośrednictwem poczty elektronicznej na adres: customerservices@wiltshire.gov.uk



Equality Analysis Evidence Document Title: What are you completing an Equality Analysis on? Submission Draft Wiltshire Housing Site Allocations Plan (the draft Plan) Why are you completing the Equality Analysis? (please tick any that apply) Proposed New Policy or Change to Policy or Service Service Review Service Yes - new planning policies. **Version Control** 27 6 17 Version Date Reason for control review (if number appropriate) 30-4-18 Further work has been carried out to Version Date Reason for produce a submission version draft control review (if Plan which will be submitted to the number appropriate) Secretary of State for Examination.

Risk Rating Score (use <u>Equalities Risk Matrix</u> and guidance)

^{**}If any of these are 3 or above, an Impact Assessment **must** be completed. Please check with equalities@wiltshire.gov.uk for advice

Criteria	Inherent risk score on proposal	Residual risk score after mitigating actions have been identified
Legal challenge	4	1
Financial costs/implications	3	1
People impacts	2	1
Reputational damage	3	1



Section 1 – Description of what is being analysed

A planning policy document, the Wiltshire Housing Site Allocations Plan (hereafter referred to as the draft Plan), is being prepared for the purposes of maintaining and ensuring both surety and continuity of housing land supply across Wiltshire, and thereby is supporting the implementation of the Wiltshire Core Strategy (WCS). A separate and complimentary document, the Chippenham Site Allocations Plan, addresses the identification of land for strategically important housing and employment sites at Chippenham. The draft Plan sits directly under the Wiltshire Core Strategy. The draft Plan has now reached submission stage and subject to endorsement by Cabinet and approval by Council will be submitted to the Secretary of State for Examination. The duty to carry out an Equalities Impact Assessment is set out in the Equality Act 2010¹. The Equalities Impact Assessment is classified under Regulation 22 (1) (e) as a supporting document which in the Council's opinion is relevant to the preparation of the local plan.

The National Planning Policy Framework² sets out the following requirements which have been met by the draft Plan:

- Paragraph 50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
- Paragraph 69. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans.
- Paragraph 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively.

It is the purpose of this draft Plan to implement the framework set by the WCS by allocating additional housing sites across Wiltshire in accordance with the settlement strategy as outlined in Core Policy 1. In this respect it should be noted that the draft Plan is only seeking to address the indicative housing requirement of 36,950 dwellings (excluding Chippenham Town and West Swindon) as expressed in Table 1 of Core Policy 2 of the WCS through allocating housing sites across the Wiltshire in accordance with the spatial strategy for the period up to 2026. In addition, the draft Plan assesses the existing "settlement boundaries" or "Limits of Development" as they are referred to in Core Policy 2.

In planning for future housing numbers the proposals of this draft plan will be in line with the Wiltshire Core Strategy suite of policies and will seek to:

- Provide for the most sustainable pattern of development that minimises the need to travel and maximises the use of sustainable transport.
- Align residential development to the employment growth planned for in the WCS, in order to achieve a greater self-containment of communities and not intensify out commuting.

¹ Section 149 of the Equalities Act 2010.

² https://www.gov.uk/government/publications/national-planning-policy-framework--2



- Manage development to ensure the timely delivery of supporting infrastructure to mitigate the impact of growth on local services and facilities.
- Protect, and where possible enhance, the natural, historic and built environment within and surrounding settlements whilst recognising development on the periphery of settlements is inevitable.
- Respect the individual identities of villages, towns and cities within the landscape setting and their relationship to one another through careful site selection and requiring high quality design and landscaping.
- Deliver affordable housing as a proportion of the housing development in line with Core Policy 42 of the Wiltshire Core Strategy which requires 30-40% of housing to be affordable.

Section 2A – People or communities that are currently **targeted or could be affected** by any change (please take note of the Protected Characteristics listed in the action table).

The overarching strategy of the WCS is to deliver homes, infrastructure, services and employment opportunities to meet the needs of all who live, work and visit Wiltshire and the draft Plan will help to deliver that strategy.

The draft Plan has been developed in an open and collaborative manner in line with the Council's Statement of Community Involvement³:

A record of the consultation that has taken place can be found in the Statement of Early Community Engagement June 2017, and associated reports and the Regulation 22 (1) (c)⁴ Report⁵. To date is has included the following consultations:

Consultation	Date	Who was consulted
Formal Regulation 18	24th March – 5th May 2014	All listed below
consultation on the scope.		
Informal consultation draft	28 th July – 22 nd September	Town and parish councils
proposals for amending	2014	
settlement boundaries.		
Informal consultation on the	23 rd February – 31 st March	Town and parish councils
site assessment	2015	Developers
methodology and initial site		Specialist bodies
options.		
Informal consultation on the	30 th June – 12 th August	Town and parish councils
approach to large villages.	2015	Developers
		Specialist bodies
Landowner Deliverability	21st August – 2nd October	Landowners
Consultation.	2015	
Formal consultation on the	14 July – 22 September	All listed below
draft Wiltshire Housing Site	2017	
Allocations DPD.		
Examination.	TBC	TBC

³ http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/statementofcommunityinvolvement.htm.

http://www.wiltshire.gov.uk/planningpolicydocuments.htm? directory=Wiltshire%20 Housing%20 Site%20 Allocations%20 DPD

⁴ Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ The consultation statements can be found on the following link:



The consultations are based on the Wiltshire Council spatial planning database, national legislation and national policy advice, and specialist knowledge within the organisation. This includes:

- All citizens who have requested contact
- Local town and parish councils
- All elected representatives
- The Environment Agency
- English Heritage
- Natural England
- Network Rail
- Highways England
- Relevant health providers
- Relevant water and sewerage providers
- Homes and Communities Agency
- Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area

- Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
- Bodies which represent the interests of different religious groups in the local planning authority's area
- Bodies which represent the interests of disabled persons in the local authority's area
- Bodies which represent the interests of persons carrying on business in the local planning authority's area

As well as the standard local, regional and national consultees, for the draft Plan the following hard to reach groups were consulted:

- Young Persons Council
- Friends Families and Travellers
- The Showman's Guild of Great Britain
- Selwood Housing Society
- SCOPE Partnership & Community Development Division
- Kennet and Avon Boating Community
- Diabetes UK Wiltshire

All the above groups can be directly affected by the volume, location and design of new homes in Wiltshire. The techniques used to ensure effective engagement are covered in Section 3 below.

Section 2B – People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

The draft Plan contents were discussed at various meetings with the Council's development management officers and specialist areas such as conservation, highways and archaeology. Those elsewhere in the Council affected by or involved in the delivery of the draft Plan were primarily involved in the preparation of relevant evidence papers on site selection by providing information and by establishing requirements for policies and proposals.

Section 3 –The underpinning **evidence and data** used for the analysis (Attach documents where appropriate)

Prompts:

What data do you collect about your customers/staff?



- What local, regional and national research is there that you could use?
- How do your Governance documents (Terms of Reference, operating procedures) reflect the need to consider the Public Sector Equality Duty?
- What are the issues that you or your partners or stakeholders already know about?
- What engagement, involvement and consultation work have you done? How
 was this carried out, with whom? Whose voices are missing? What does this
 tell you about potential take-up and satisfaction with existing services?

Are there any gaps in your knowledge? If so, do you need to identify how you will collect data to fill the gap (feed this into the action table if necessary)

The context for the evidence and data used to inform this process is set within the National Planning Policy Framework at paragraph 158:

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

All parts of the draft Plan are based on the collation and analysis of evidence, including the evidence base studies that underpin the WCS and an evidence base dealing specifically with the delivery of housing.

The draft Plan is based on sound research and analysis to identify the challenges faced in site allocation. All conclusions reached in the draft Plan are founded on analysis of the evidence, which is available for scrutiny.

The evidence behind the site allocation process is published for each Community Area in the form of Community Area Topic Papers. A number of other evidence based topic papers are published alongside the community area topic papers and include:

- Topic Paper 1 Settlement Boundary Review Methodology (Updated May 2018)
- Topic Paper 2 Site Selection Process Methodology June 2017
- Topic Paper 3 Housing Land Supply June 2017
- Addendum to Topic Paper 3 Housing Land Supply May 2018
- Topic Paper 4 Developing Plan Proposals June 2017
- Addendum to Topic Paper 4 Developing Plan Proposals May 2018
- Assessment of Viability, BNP Paribas, June 2017
- Sustainability Appraisal Report, Atkins, updated May 2018
- Assessment under the Habitat Regulations June 2017
- Duty to Cooperate Report June 2017
- Addendum to the Duty to Cooperate Report May 2018
- Statement of Early Community Engagement June 2017, and associated reports
- Regulation 22 (1) (c) Report of Pre-Submission Consultation Summer 2017
- Heritage Impact Assessment, LUC, March 2018
- Draft Trowbridge Transport Strategy Refresh 2018
- Draft Salisbury Transport Strategy Refresh 2018
- Addendum Assessment under Habitats Regulations



The draft Plan is supported by a Sustainability Appraisal (as referred to above) prepared by Atkins which is an evidence tool to assess and inform the development of the draft Plan. The Sustainability Appraisal promotes sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

*Section 4 – Conclusions drawn about the impact of the proposed change or new service/policy

Prompts:

- What actions do you plan to take as a result of this equality analysis?
 Please state them and also feed these into the action table
- Be clear and specific about the impacts for each Protected Characteristic group (where relevant)
- Can you also identify positive actions which promote equality of opportunity and foster good relations between groups of people as well as adverse impacts?
- What are the implications for Procurement/Commissioning arrangements that may be happening as a result of your work?
- Do you plan to include equalities aspects into any service agreements and if so, how do you plan to manage these through the life of the service?
- If you have found that the policy or service change might have an adverse impact on a particular group of people and are **not** taking action to mitigate against this, you will need to fully justify your decision and evidence it in this section

The actions necessary to be delivered as part of this equality assessment are those enshrined within the strategy. The strategy will have a significant positive impact on the large majority of the communities in Wiltshire. The draft Plan attempts to tackle existing inequalities highlighted in the evidence base, including in the Strategic Housing Market Assessment, through the delivery of the following outcomes:

- Enabling the delivery of a significant amount of affordable housing and increased access for all to a decent affordable home. The housing sites delivered will include a proportion of affordable housing in line with Core Policy 42 of the Core Strategy which requires 30-40% of housing to be affordable.
- Enabling the delivery of improved and accessible services and infrastructure for the benefit of all members of the community. This includes the provision of new primary school provision to support new housing where necessary.
- Undertaking consultation exercises which engages minority and hard to reach groups.
- Protection and enhancement of the built heritage and natural environment, in line with the WCS.
- Protection of open space, public rights of way and recreation facilities through the site selection process and within policy. There are requirements for further open space provision within the draft Plan.
- Buildings that provide access for all.
- Viable communities that are robust and resilient, and able to retain important local services.
- Provision of meaningful transport choices for those who are marginalized due to not having a private motor car.
- To ensure that the elderly have good access to vital services.
- To ensure rural communities are able to retain locally valued services and facilities.



- To ensure that larger scale development in Wiltshire is complemented by smaller scale and appropriately managed development in rural areas to ensure that benefits are felt across Wiltshire as a whole.
- Ensuring development is of high quality design that creates a strong sense of place.

The draft Plan involves allocating new development sites in Wiltshire, and there will be people who feel disadvantaged by the development that will take place. This is expressed through representations in response to public consultations which object to new development. The strategy has been devised to address such concerns where possible, and represents a proportionate response to the need to deliver the housing requirement for Wiltshire while protecting the quality of life of existing residents. Furthermore, potential environmental impacts will be mitigated through careful master planning.

Development could lead to pressure on existing services in smaller rural settlements, and could have an impact on access to services in more rural locations. One of the challenges will be retaining existing and valued services in the smaller settlements, and the WCS, which the draft Plan sits with, includes protective policies which seek to aid the retention of local services in Core Policies 48 and 49.

The ongoing continuous improvement of the service in producing all planning policies and future documents will be supported by the following measures:

- Ensure an in depth understanding of the diversity of the community and discuss with experts from a national and local level on how best to engage hard to reach groups.
- Target easy to understand and participatory activity sessions, such as 'planning for real' more widely and at specific groups.
- Ensure lead-in and frontloading is designed into the process, to give the time to identify and set up positive dialogue and partnerships with under-represented groups.
- Training of communication skills best suited to each audience.
- Ensuring that time, costs and resources are properly planned for and that consultation is not reduced to a 'tick-box' exercise.

It is important to seek balanced views and where there is conflict a forum which promotes debate between parties with differing views is extremely beneficial in seeking compromise.

*Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?

Prompts:

- Do you need to design performance measures that identify the impact (outcomes) of your policy/strategy/change of service on different protected characteristic groups?
- What stakeholder groups and arrangements for monitoring do you have in place? Is equality a standing agenda item at meetings?
- Who will be the lead officer responsible for ensuring actions that have been identified are monitored and reviewed?
- How will you publish and communicate the outcomes from this equality analysis? How will you integrate the outcomes from this equality analysis in any relevant Strategies/Polices?



This assessment will sit alongside other key documents such as the Sustainability Appraisal and Assessment under the Habitats Regulations and form part of a toolbox that has informed the development of the draft Plan. The outcomes of the draft Plan will be reviewed and monitored through the Authority's Monitoring Report (formerly the Annual Monitoring Report).

It will be ensured that changes in law, guidance and best practice are identified and incorporated wherever relevant.

This Equality Impact Assessment forms an important supporting document to the draft Plan. It will be published and be available as part of a suite of documents supporting the submission draft Plan.

The draft Plan aims to positively manage growth in accordance with the Wiltshire Core Strategy and seeks to ensure sufficient homes are available to meet housing needs. The public consultations have been designed to help ensure that everyone has the opportunity to comment on the draft Plan.

When the draft Plan is submitted to the Secretary of State for examination, it will be accompanied by this Equalities Impact Assessment undertaken as part of a process to help the Council ensure that it discharges its duties under section 149 under the Equality Act 2010 to have due regard to the need to: eliminate discrimination; 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.

Completed by:	Dave Milton		
Date	20.9.16		
Signed off by	Georgina Clampitt-Dix	(
Reviewed by: (to support the pre- submission draft Plan)	Jane Wilkie		
Date	27.6.17		
Reviewed by: (to support the submission draft Plan)	Jane Wilkie		
Date	30.4.18		
For Corporate Equality Use only	Compliance sign off date	02.05.18	
	Published on internet date		



Equality Impact Issues and Action Table (for more information on protected characteristics, see definitions at the end of this document)					
Identified issue drawn from your conclusions (only use those characteristics that are relevant)	Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?	Who is responsible for the actions?	When will the action be completed?	How will it be monitored?	What is the expected outcome from the action?
Age Sites identified in the draft Plan will deliver sustainable communities that will be delivered in line with the adopted polices of the WCS, which have been designed to safeguard all sectors of the community. The draft Plan provides for policies which will provide equal opportunities for all, including younger people. New education provision is planned to support the additional demand that growth in housing numbers will bring.	WCS Core Policy 46 sets out the strategy for meeting the needs of Wiltshire's vulnerable and older people.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).6

⁶ http://www.wiltshire.gov.uk/housing-local-housing-needs



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Groups representing					
young people have					
been targeted through					
the consultation					
including:					
Young Persons					
Council					
 Youth Action (Wilts) 					
Youth Development					
Centres					
Disability					
Strategic sites identified	The new development	Partnership working	Up to 2026	Authority's Monitoring	Delivering the homes
in the draft Plan will	proposed by the draft	between Wiltshire		Report	necessary, including
deliver sustainable	Plan will be required to	Council, developers			affordable and lifetime
communities that will	meet the relevant	and local communities.			homes to meet
be delivered in line with	nationally set access				objectively assessed
the adopted polices of	standards (part M of				housing needs as
the WCS, which have	the Building				assessed in the
been designed to	Regulations) and will				Strategic Housing
safeguard all sectors of	not result in				Market assessment
the community.	discrimination of people				(SHMA).
	with disabilities.				(- ,
Disabled groups have					
been targeted through					
the consultation					
including:					
Transport for the					
Disabled and					
Pensioner's Voice					
The Multiple					
Sclerosis Society					
Royal National					
Institute of Blind					
people					
Diabetes UK					
Wiltshire					
			1		



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Gender Reassignment			•		
The draft Plan provides for policies which will provide equal opportunities for all, regardless of gender.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Marriage and Civil Partr					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of marital status.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Pregnancy and Materni			1		
The draft Plan provides for policies which will provide equal opportunities for all, regardless of this issue.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Race (including ethnicity	or national origin, colour, n	ationality and Gypsies and	Travellers)		



The draft Plan provides for policies which will provide equal opportunities for all, regardless of race. Ethnic groups have been targeted through the consultation including: • Friends Families and Travellers • The Showmans Guild of Great Britain • Turkish Community Union • Friends of Romania's Horses • The Romany Gypsy Council • Gypsy Council • Racial Equality Council	WCS Core Policy 47 deals with providing for Gypsies and Travellers. A Gypsy and Traveller Development Plan Document is also under preparation. The draft Plan will complement the policies of both documents.	Spatial Planning	2016	Authority's Monitoring Report	Providing adequate pitches and facilities for the Gypsy and Traveller needs within Wiltshire.
Religion and Belief					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of religion. Faith groups have been engaged throughout the consultation process. The Plan does not propose any form of development that would	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).



obstruct faith groups functioning as normal. Religious groups have been targeted through the consultation including: • Sikh Missionary Society • Dauntsey Church.					
Sex	•		•		
The draft Plan provides for policies which will provide equal opportunities for all, regardless of sex.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Sexual Orientation	I	1		ı	1
The draft Plan provides for policies which will provide equal opportunities for all, regardless of sexual orientation.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).



Calculating the Equalities Risk Score

You will need to calculate a risk score twice:

- 1. On the inherent risk of the proposal itself (without taking into account any mitigating actions you may identify at the end of the Equality Analysis (EA) process) 7
- 2. On the risk that remains (the residual risk) after mitigating actions have been identified

This is necessary at both points to:

- Firstly, identify whether an EA needs to be completed for the proposal and;
- Secondly, to understand what risk would be left if the actions identified to mitigate against any adverse impact are implemented

Stage 1 - to get the inherent risk rating:

- 1. Use the <u>Equalities Risk Criteria Table</u> below and score each criteria on a scale of 1 4 for the impact and their likelihood of occurrence. Multiply these 2 scores together (Likelihood x Impact) to get an overall score (this will range from 1 16)
- 2. Consider the scores and if any one aspect scores a 4 then this is likely to outweigh all others. On this basis determine the appropriate score for the risk. (Do not average scores since this will almost always produce a low average scored risk)
- 3. Assess whether you need to carry out an EA using the guidance box below (stage 2)
- 4. If an EA is needed (i.e. your score is above 3) make a note of your inherent score using the red, amber, green colour rating on the <u>first page</u> of the EA template

Stage 2 - to identify whether an EA needs to be carried out:

If your inherent risk score is:

12 – 16 or Red = High Risk. **An Equality Analysis must be completed.** Significant risks which have to be actively managed; reduce the likelihood and/or impact through control measures.

6 – 9 or Amber = Medium Risk. **An Equality Analysis must be completed**. Manageable risks, controls to be put in place; managers should consider the cost of implementing controls against the benefit in the reduction of risk exposure.

3 – 4 or Green = Low Risk. An Equality Analysis must be completed

1 - 2 or Green = Low Risk. An Equality Analysis does not have to be completed

Stage 3 - to get the residual risk rating:

- 1. Repeat the process above when mitigating actions have been identified and evidenced in the <u>table</u> on page 3 to calculate the **residual risk**
- 2. Make a note of the residual risk score using the red, amber, green colour rating on the <u>first</u> <u>page</u> of the EA template

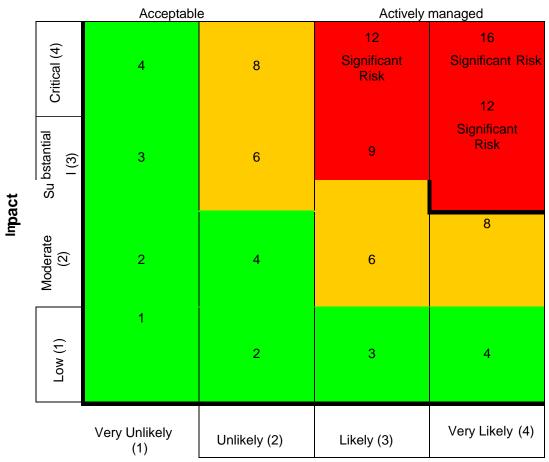


Equalities Risk Criteria Table

Impact	Low	Moderate	Substantial 3	Critical
Criteria	1	2		4
Legal challenge to the Authority under the Public Sector Equality Duty	Complaint/initial challenge may easily be resolved	Internal investigation following a number of complaints or challenges	Ombudsman complaint following unresolved complaints or challenges	Risk of high level challenge resulting in Judicial Review
Financial costs/implications	Little or no additional financial implication as a result of this decision or proposal	Medium level implication with internal legal costs and internal resources	High financial impact - External legal advice and internal resources	Severe financial impact - legal costs and internal resources
People impacts	No or Low or level of impact on isolation, quality of life, achievement, access to services. Unlikely to result in harm or injury. Mitigating actions are sufficient	Significant quality of life issues i.e. Achievement, access to services. Minor to significant levels of harm, injury. mistreatment or abuse OR, low level of impact that is possible or likely to occur with over 500 people potentially affected	Serious Quality of Life issues i.e. Where isolation increases or vulnerability is greatly affected as a result. Injury and/or serious mistreatment or abuse of an individual for whom the Council has a responsibility OR, a medium level of impact that is likely to occur with over 500 people potentially affected	Death of an individual for whom the Council has a responsibility or serious mistreatment or abuse resulting in criminal charges OR High level of impact that is likely to occur, with potentially over 500 people potentially affected
Reputational damage	Little or no impact outside of the Council	Some negative local media reporting	Significant to high levels of negative front page reports/editorial comment in	National attention and media coverage



Equalities Risk Matrix



Likelihood of occurrence



The protected characteristics:

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds). This includes all ages, including children and young people and older people.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment - The process of transitioning from one gender to another.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Marriage and civil partnership - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships' and get married (from 29 March 2014) at certain religious venues. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity - Pregnancy is the condition of being pregnant.

Maternity refers to the period of 26 weeks after the birth, which reflects the period of a woman's ordinary maternity leave entitlement in the employment context.

Sex (this was previously called 'gender') - A man or a woman.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

You are also protected if you are discriminated against because you are **perceived** to have, or are **associated** with someone who has, a protected characteristic. For example, the Equality Act will protect people who are caring for a disabled child or relative. They will be protected by virtue of their association to that person (e.g. if the Carer is refused a service because of the person they are caring for, this would amount to discrimination by association and they would be protected under the Equality Act)

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For further information please visit the following website:

http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on customerservices@wiltshire.gov.uk.