

Appendix G



**Mid Suffolk District Council
Babergh District Council
Joint Equality Impact Assessment
Template**

Summary of activity (to keep a record of the stages of the assessment already completed)		
Assessment section(s)	Date completed	By who

1) General information			
1a) Please state if you are assessing a strategy, policy, project, contract, decision or function	Decision		
1b) What is the name of the strategy, policy, project, contract, decision or function being assessed?	Community Infrastructure Levy (CIL) adoption		
1c) Who are you targeting with the strategy, policy, project, contract, decision or function? (Please tick any that are applicable)	Residents <input checked="" type="checkbox"/>	Staff <input type="checkbox"/>	Specific protected characteristics <input type="checkbox"/>
If specific 'protected characteristics' please state ...			
1d) Are there any other individuals, departments or partners involved in the delivery of the strategy, policy, project, contract, decision or function?	Yes <input checked="" type="checkbox"/>		No <input type="checkbox"/>
If yes please state who ...	<p>Babergh District Council (staff, elected members and associated parties including consultants and infrastructure providers) have led on the development and implementation of CIL, including a project group drawing on expertise from different service areas as well as a member group to help steer the process.</p> <p>Various stakeholder groups have been involved in the development and implementation of CIL. In Summer of 2014, two workshops were held with various developers, agents and landowners as well as subsequent meetings every six months for developers, agents and landowners to discuss CIL along with a continuing dialogue updating them on the development of CIL. There have been continual meetings with Parish and Town Councils throughout the development of the CIL project.</p> <p>The Preliminary Draft Charging Schedule was subjected to a 8 week public consultation, the Draft Charging Schedule was subject to a 6 week public consultation and the revised draft Charging Schedule has been subject to four week public consultation.</p> <p>There has been an independent examination as per the regulations set down by Government. This examination focused on economic viability and whether the proposed CIL charge has any unintended effects on certain types of development or geographic locations and therefore had an indirect consideration to the charges impact on equality.</p>		
1e) Is this a new or existing strategy, policy, project, contract, decision or function?	New <input checked="" type="checkbox"/>		Existing <input type="checkbox"/>

<p>1f) What is the main purpose of the strategy, policy, project, contract, decision or function?</p>	<p>The Community Infrastructure Levy (CIL) is a new planning charge introduced under the Planning Act 2008. It allows local authorities in England and Wales to charge developers who are building in their area. The money can be used to pay for a wide range of infrastructure that is needed to support growth of the area. This can include things like new roads, schools and community facilities.</p> <p>CIL is not charged on affordable housing and buildings used for charitable purposes. The amount payable for other forms of development will be set at the time of planning permission is granted and payment will be due at the commencement of development. Larger amounts will be payable in instalments over fixed time periods. CIL is intended to complement rather than replace other funding streams and is intended to promote development rather than hinder it. Its main advantages are that:</p> <ul style="list-style-type: none"> • It is modest, representing around 2-5% of total development costs and is not charged on types of development that cannot sustain it; • It is a fixed, non-negotiable charge and is therefore transparent and predictable; • It is less time-consuming and complicated than s106 planning obligations, with less need for protracted negotiations with applicants and the drawing up of legal agreements; and • Local communities will be able to influence how a proportion of CIL receipts are spent in their areas, so that communities can benefit from development in their area. <p>The introduction of CIL should, in principle, benefit all groups by contributing to the delivery of strategic and local infrastructure and helping to achieve more sustainable development. CIL payments will be used to fund infrastructure such as delivery of new school places, health facilities, public realm, open space projects and therefore it is anticipated it will generate benefits for all equality groups. Any possible impacts would arise at the time money is secured through CIL and new or improved infrastructure is actually delivered; impacts will not arise directly as a result of the CIL Charging Schedule itself.</p> <p>The Department for Communities and Local Government (DCLG) undertook Equalities Impact Assessment of CIL legislation and regulations in January 2012. Part of this assessment states that:</p> <p><i>“The Community Infrastructure Levy is unlikely to have an adverse impact on any social group. By making communities more sustainable, the Community Infrastructure Levy will facilitate economic growth and liveability and so create opportunity for all. The infrastructure and services that the Community</i></p>
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	<p><i>Infrastructure Levy will provide (such as medical and community facilities and transport networks) will enhance accessibility and liveability for all sectors of society, and could help to deliver new infrastructure that serves different needs within the community, for example, by increasing mobility and accessibility. We do not anticipate the reforms to the Community Infrastructure Levy changing this assessment.”</i> DCLG, Jan 2010 (http://www.parliament.uk/documents/impact-assessments/IA11-010AG.pdf)</p> <p>It is clear that the Government do not expect the implementation of CIL to cause any adverse impact on any protected characteristic groups; indeed they anticipate that it will in general have a positive influence on a number of groups.</p>	
<p>1g) In your opinion, does the strategy, policy, project, contract, decision or function need to be equality impact assessed?</p> <p>If no, please fully explain your reasons and describe the evidence you used to come to this decision. Then go to Q17</p>	<p>Yes ✓ (Go to Q2)</p>	<p>No ✗</p>

2) Gathering information to help the assessment		
<p>2a) What information will you use to assess the impact of the strategy, policy, project, contract, decision or function? (Please tick any that are applicable)</p>	Performance indicators/targets	✓
	Benchmarking with other organisations	✓
	Complaints information	
	Consultation results	✓
	External verification, i.e. expert views of stakeholders/employers organisations representing people with protected characteristics	
	Service uptake data	✓
	Staff monitoring data	
	Staff survey results	
	User satisfaction survey results	✓
	Risk assessment	✓
	Other, please state...	

<p>2b) Please provide a list of all evidence gathered i.e. document titles, sources etc</p>	<p>CIL Draft Charging Schedule CIL Revised Draft Charging Schedule CIL Preliminary Draft Charging Schedule Census data 2011 Affordable Housing SPD Babergh and Mid Suffolk CIL Viability Addendum Babergh and Mid Suffolk CIL: Preliminary Draft Charging Schedule (May 2014) Babergh and Mid Suffolk CIL Viability Study (April 2014) Babergh Infrastructure Delivery Plan (February 2013) Mid Suffolk Infrastructure Delivery Plan (April 2014) Mid Suffolk Core Strategy (September 2008) Mid Suffolk Core Strategy Focused review (December 2012) Babergh Core Strategy (February 2014)</p>
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3) Type of impact

<p>3a) Using your evidence in Q2a, you now need to make an initial assessment of the type of impact you might expect to find with this strategy, policy, project, contract, decision or function for:</p> <p>1) People with protected characteristics 2) Mid Suffolk District Council staff 3) Residents</p> <p>(Please tick a box for each protected characteristic)</p>	Protected characteristics	No negative impact	Negative impact	Insufficient evidence
	Age	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Carers ¹	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Disability	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Gender reassignment	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Marriage and civil partnership	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Pregnancy and maternity	✓	<input type="checkbox"/>	<input type="checkbox"/>
	² Race	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Religion or belief	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Sex	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Sexual orientation	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Socio economic (income, rural isolation)	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Transgender	✓	<input type="checkbox"/>	<input type="checkbox"/>
	Other, please state...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4) Identifying potential negative impacts

<p>4a) You now need to list and explain each negative impact identified in Q3a, providing details of the protected characteristics affected, and what the negative impacts are</p>	Protected characteristic	What the potential negative impact is	Evidence of potential negative impact (if any i.e. document titles / names / dates)

¹ Includes people who have caring responsibility for children or for sick/disabled adults

² Includes Gypsies, Travellers and Non UK Nationals

Note: When providing the evidence for potential negative impacts, use the information you gathered in Q2a. If you have no evidence of the negative impact, please say so...			

5) Uptake of services impact			
5a) Do you think people with protected characteristics will take up services associated with the strategy, policy, project, contract, decision or function equal to Mid Suffolk District Council staff or residents? If no, please provide details...	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Insufficient evidence <input type="checkbox"/>
5b) Do you think the strategy, policy, project, contract, decision or function likely to exclude or disadvantage people with protected characteristics in the longer term? Please provide details...	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Insufficient evidence <input type="checkbox"/>
	<p>Age – The age breakdown for Babergh is as follows:</p> <p>16 years or under: 18.14% 16 to 64 years: 60.48% 65 years and over: 21.38%</p> <p>The age breakdown for Mid Suffolk is as follows:</p> <p>16 years or under: 18.43% 16 to 64 years: 61.44% 65 years and over: 20.13%</p> <p>The CIL regulations establish that social housing is exempt from paying CIL and there is charitable relief. Therefore, this may benefit older persons and young families who rely on the provision of social housing and support from charities.</p> <p>The councils are proposing a NIL charge on healthcare and education facilities which means the CIL will not represent an additional financial barrier to the delivery of these uses. Indeed the charging of CIL from other development uses will help deliver much needed education places and health facilities, particularly, in areas earmarked for significant population growth.</p> <p>CIL may also fund, in whole or part transport infrastructure which will benefit older and younger population's alike improving accessibility to community services facilities.</p>		

Carers –There is only a limited amount of information on carers available. As outlined above the introduction of CIL should result in positive effects on all equality groups as it helps deliver strategic and local infrastructure to support new developments and population growth

Disability – In Babergh there is a total of 17.38% of the population are limited with day to day activities.

Limited a lot – 7.22%
 Limited a little – 10.16%

In Mid Suffolk there is a total of 16.55% of the population are limited with day to day activities.

Limited a lot – 6.67%
 Limited a little – 9.88%

The CIL regulations establish that social housing is exempt from paying CIL and there is charitable relief.

The councils are proposing a NIL charge on healthcare and education facilities which means the CIL will not represent an additional financial barrier to the delivery of these uses. Indeed the charging of CIL from other development uses will help deliver much needed education places and health facilities, particularly, in areas earmarked for significant population growth.

CIL may also fund, in whole or part transport infrastructure which will benefit older and younger population's alike improved accessibility to community services facilities.

Gender Assignment – Overall not much is known about gender reassignment group in the areas. There is no specific impact (positive or negative) are identified for the gender assignment group although as outlined above the introduction of CIL will benefit all groups and people by contributing to the delivery of strategic and local infrastructure.

Marriage and civil partnership – No known negative impacts have been identified for this target group and as noted above, the introduction of CIL should benefit all groups.

Pregnancy and maternity – No known negative impacts have been identified for this target group and as noted above, the introduction of CIL should benefit all groups.

Race – Babergh has a population which is 95.36% which is White British. Mid Suffolk has a population which is 95.88% which is White British.

Overall it is considered that that the proposed charging schedule for CIL is likely to benefit various race equality groups in the districts.

Social housing is exempt from making CIL payments so CIL will not represent an additional barrier to the delivery of social housing and therefore, may help address overcrowding issues affects all races including BME groups.

Religion or belief – In terms of religion, 63.2% of Babergh residents identify themselves as Christian and 28.4% say they do not have a religion with 7.3% not stating.

63.8% of Mid Suffolk residents identify themselves as Christian and 27.6% say they do not have a religion with 7.8% not stating.

The proposed CIL charging schedule does not include a charge for new religious institutions which again means CIL will not represent a financial barrier to the delivery of such facilities. It should also be noted that the CIL regulations declare buildings proposed by charities and used for charitable purposes are exempt from paying CIL.

Sex – The gender split in Babergh is (49% males and 51% females) and Mid Suffolk is (49.5% males and 50.5% females) which is similar to the Suffolk and England ratio, which are both around 50-50.

There are no specific impact (positive or negative) identified although the introduction of CIL will benefit all groups and people by contributing to the delivery of strategic and local infrastructure.

Sexual Orientation – There is only a limited amount of information on sexual orientation available. Guidance from the Equality and Human Rights Commission states to collect it where relevant and sexual orientation so not considered significantly relevant to the charging of CIL.

	<p>As outlined above the introduction of CIL should result in positive effects on all equality groups as it helps deliver strategic and local infrastructure to support new developments and population growth.</p> <p>Socio economic factors – Overall it is considered that the proposed charging levels of CIL should benefit the socio-economic position.</p> <p>The CIL regulations establish that social housing is exempt from paying CIL and there is charitable relief which should have a positive impact.</p> <p>Transgender – There is only a limited amount of information on transgender available. As outlined above the introduction of CIL should result in positive effects on all equality groups as it helps deliver strategic and local infrastructure to support new developments and population growth</p>
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6) Delivery impacts

6a) Please check the delivery arrangements for the strategy, policy, project, contract, decision or function against the criteria (please tick appropriate boxes)	Are the premises accessible for all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the computer software and infrastructure accessible for all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the consultation and participation inclusive of all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are public events and meetings accessible for all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6b) If you answered 'no' to any of the above, please explain how and why, giving details of any legal justification if you can...				

7) Communication impacts

7a) Please check the accessibility of your information and communication arrangements for the strategy, policy, project, contract, decision or function against the criteria (please tick appropriate boxes)	Are customer contact methods accessible for all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is electronic, web based and paper information accessible for all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are publicity campaigns inclusive of all?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	Are images and text in documents representative of all?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

7b) If you answered 'no' to any of the above, please explain how and why, giving details of any legal justification if you can...	
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8) Making improvements

8a) If you have identified any potential negative impacts in Q3-7, can they be easily addressed?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8b) If yes, please list negative impact(s) and state how they will be addressed	Negative Impact	How it will be addressed	
8c) If negative impact (s) cannot be addressed for legal reasons, please explain, giving details of your justification i.e. including details of any legislation if you can...			

9) Making a decision

Decision (please tick one box)		Action to take
9a) The evidence has identified no negative impacts	<input checked="" type="checkbox"/>	Go to Q17
9b) The evidence indicates that there are negative impacts but they can be easily addressed	<input type="checkbox"/>	Go to Q17 and implement any actions you have identified in Q8b
9c) The evidence indicates potential negative impacts that cannot be easily addressed	<input type="checkbox"/>	Action planning required. Go to Action planning Q15
9d) A negative impact was identified but it can be legally justified	<input type="checkbox"/>	Go to Q17
9e) There is not enough evidence to say whether or not there is a negative impact	<input type="checkbox"/>	Additional evidence needed. Go to Additional evidence gathering Q10

10) Additional evidence gathering

General information

Names of other people involved in additional evidence gathering	
Responsible Department	
Responsible Manager	

Notes:

Your assessment so far has identified insufficient evidence to make a judgement about whether your policy, project, contract, decision or function potentially negatively impacts on people with protected characteristics. You will therefore need to undertake some additional evidence gathering before making a final decision.

a) For advice on where to gather information please contact:

- Lead Officer for Equality Impact Assessment Sub Group
- Lead Officer for Equality and Diversity

b) Contact details for the above Officers can be found on InfoWeb:

<http://pan/C16/Equality%20Impact%20Assessments/default.aspx>

c) Available information already gathered can be found on InfoWeb:

<http://pan/C10/C5/Mid%20Suffolk%20District%20datainfor/default.aspx>

d) To discuss any proposed consultation please contact:

The Lead Officer for the Community Engagement Strategic Priority Group 6 (SPG6)

e) Contact details for the SPG6 Lead Officer can be found on InfoWeb:

<http://infoweb.mid-suffolk.local/C4/C1/Community%20Engagement/default.aspx>

11) Gathering additional information		
Gather and analyse relevant additional information to address the gaps in your knowledge, enhance your understanding of the issues and inform options for addressing these.		
11a) What additional evidence are you going to gather? (Please tick any that are applicable)	Advice from experts	
	Data about the physical environment, i.e. housing market or workforce	
	Demographic profile, i.e. Census	
	Existing consultation results	
	External verification i.e. expert views of stakeholders organisations representing people with protected characteristics	
	Local needs analysis	
	National best practice information i.e. Audit Commission reports	
	New consultation with a specific group(s)	
	Research reports on experiences of diverse group(s)	
	Specialist staff expertise	
	Other, please state...	
11b) Please give a summary of additional evidence you have gathered	Document details (title / name / date)	Brief summary

12) Uptake of services impact		
Having now gathered additional evidence, please answer the questions below again...		
12a) Do you think people with protected characteristics will take up services associated with the strategy, policy, project, contract, decision or function equal to Mid Suffolk District Council staff or residents? If no, please provide details...	Yes <input type="checkbox"/>	No <input type="checkbox"/>
13b) Is the strategy, policy, project, contract, decision or function likely to exclude or disadvantage people with protected characteristics in the longer term?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please provide details...	
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13) Making improvements

13a) Having gathered additional evidence, have you now identified any potential negative impacts for anyone with a protected characteristic?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
13b) Can the negative impact(s) be easily addressed?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13c) If yes, please list the negative impacts and state how they can be addressed	Negative Impact	How it will be addressed	

14) Making a decision

Decision (please tick one box)		Action to take
14a) The evidence has identified no negative impacts	<input type="checkbox"/>	Go to Q17
14b) The evidence indicates that there are negative impacts but they can be easily addressed	<input type="checkbox"/>	Go to Q17 and implement any actions you have identified in Q13c
14c) The evidence indicates potential negative impacts that can not be easily addressed	<input type="checkbox"/>	Go to Action planning Q15
14d) A negative impact was identified but it can be legally justified	<input type="checkbox"/>	Go to Q17

15) Action planning

General information

Names of other people involved in action planning	
Responsible Department	
Responsible Manager	

Notes:

a) You need to draw up an action plan to address the negative impact(s) you have found:

Identify clearly in your action plan the following:

- Protected characteristics affected
- Potential negative impact(s)
- Action(s) to be taken to address negative impact(s)
- Named person responsible for action(s)
- Time by which action(s) will be achieved
- Resources required to achieve action(s)
- Progress report section

b) Use your additional evidence gathering to develop actions for addressing any negative impacts identified that have not been addressed.

c) Please attach a copy of your action plan to this form ensuring it is updated at intervals specified in Q16a.

16) Monitoring arrangements for action plan to address negative impact/s	
16a) When will you monitor, review and update the action plan to address identified negative impact/s? (if at intervals please state)	
16b) Who will be responsible for monitoring the action plan?	
16c) What is the final date all actions are to be implemented by?	
16d) Will actions be implemented immediately?	Yes <input type="checkbox"/> No <input type="checkbox"/>
16e) If no, please give details of the strategy or service plan the action(s) will be integrated into if known	
16f) How will the continuing impact of the strategy, policy, project, contract or decision be monitored?	
16g) Any other comments	

17) Monitoring arrangements for the strategy, policy, project, contract or decision		
17a) When will you monitor the strategy, policy, project, contract or decision (if at intervals please state)	Quarterly monitoring reports as well as links to the Councils performance data measures and annual reporting.	
17b) Who will be responsible for monitoring the strategy, policy, project, contract or decision?	Infrastructure team	
17c) How do you intend to monitor the impact of the strategy, policy, project, contract, decision or function? (Please tick any that are applicable)	Performance indicators/targets	✓
	Benchmarking with other organisations	✓
	Complaints information	✓
	Consultation results	
	External verification, i.e. expert views of stakeholders/employers organisations representing people with protected characteristics	
	Service uptake data	✓
	Staff monitoring data	
	Staff survey results	
	User satisfaction survey results	✓
	Risk assessment	✓
Other, please state...		
17d) Please details of all monitoring methods i.e. National Indicator 187 or name of consultation	Quarterly monitoring reports	
Please move on to Q18 for 'Completion'		

18) Completion	
Name	Kate Parnum
Job title	Project and Research Officer
Service Area	Business Improvement
Date of completion	8 th January 2016
Date of next equality impact assessment, if relevant (This should be in line with next review date of strategy, policy, project, contract, decision or function).	N/A
Management Sign Off (Please print name in block capitals)	PETER QUIRK

Notes:

When completed, an electronic copy of this assessment (with the action plan attached if appropriate) should be saved with the policy, strategy, project, contract or decision. A hard copy should be printed and signed by management and then kept in a safe place. The details of this assessment should be recorded in your service area’s policy register and should be published on the Council’s website if the policy, strategy, project, contract or decision is for external publication.

-END-