

**CABINET – 23 JANUARY 2018**

Item 6 – Reconciling Policy, Performance and Resources

Equality Impact Assessments

Equality Impact Assessment – Libraries Strategic Commissioning Strategy

Equality Impact Assessment – School Basic Need capital Programme

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## **Libraries Strategic Commissioning Strategy**

### **Appendix 1**

#### **Rationale and Impact Assessment for the Proposed Needs Based Library Service**

# Contents

<b>1.</b>	<b>Purpose of this document</b>	<b>2</b>
<b>2.</b>	<b>Rationale for the proposals</b>	<b>4</b>
<b>3.</b>	<b>Impacts of the proposals</b>	<b>14</b>
	<b>Annex 1 – Alternative travel routes and times</b>	<b>22</b>

# 1 Purpose of this document

## Purpose of this document

- 1.1 This document provides further assessment of the rationale and impact for the proposals contained within the draft Libraries Strategic Commissioning Strategy. It is one of a series of documents produced to support the Strategy, which are as follows:

**Figure 1 Schematic of draft Libraries Strategic Commissioning Strategy and supporting documents**

Draft Libraries Strategic Commissioning Strategy						
Appendix 1. Rationale and Impact Assessment for the Proposed Needs Based Library Service						
Appendix 2. Summary of Technical Appendices						
Technical Appendix 1	Technical Appendix 2	Technical Appendix 3	Technical Appendix 4	Technical Appendix 5	Technical Appendix 6	Technical Appendix 7
National and Local Context	Needs Assessment	Service Description and Analysis	Property Assessment	Accessibility Analysis	Strategic Outcomes and Gap Analysis	Delivery Model Options Appraisal

- 1.2 Based on the findings of the Technical Appendices and the draft Equalities Impact Assessment this document provides further detail on:
- The proposed ways in which people will be able to access the Library and Information Service and those parts of the service which it is proposed to stop providing
  - The likely impact of the proposals on library users, the population as a whole and also those with protected characteristics, and the proposed mitigations to address those impacts
- 1.3 The draft Libraries Strategic Commissioning Strategy aims to create a modern, affordable Library and Information Service for East Sussex, which prioritises the needs of the county and is able to adapt to future needs.
- 1.4 The term 'needs', in this context includes the general requirement that adults and children have a reasonable ability to access reading materials, information and the range of other resources that meet their general and special requirements, for the various benefits that these can provide. It also takes account of the particular needs of different communities (both of people and place) who face greater disadvantage than others.

- 1.5 For many people the obvious focus would be around reading and literacy when considering the needs that a library service can meet. However, in developing the draft Libraries Strategic Commissioning Strategy, we have set out to identify the wider needs that the Library and Information Service may be well-placed to help meet, either on its own or in partnership with others, within the resources that are available.
- 1.6 The development of the draft Strategic Commissioning Strategy also takes into account our legal responsibilities for providing a library service. This approach, and the detailed process of review that has been undertaken, are described in this and in the other Technical Appendices.
- 1.7 An affordable and adaptable Library and Information Service means that it will be able to respond to a number of common challenges facing library services across the UK, including:
- the significant budget pressures facing councils, both in terms of a reduction in grant allocated to councils at the same time as an increase in demand for key services, such as social care
  - a decrease in library use related to a shift in consumer behaviour, with increasing access to reading materials, information and public and paid services online
  - the changing needs brought about by a growing and ageing population and the move increasingly toward a knowledge based economy and the effects of a long period of financial uncertainty
- 1.8 The Strategy has been produced using the Strategic Commissioning Framework, our business planning process for all East Sussex County Council service redesign.

## 2 Rationale for the proposals

### Proposed access to library services

- 2.1. Currently there are a number of different ways to access the Library and Information Service. These include library buildings, the eLibrary, the Mobile Library and one 'village library' in Northiam. A free Home Library Service is offered to people who cannot easily use a library due to disability or frailty, or are caring for someone who cannot be left.
- 2.2. Based on the evidence of need, it is considered that a mix of different access to services should still be delivered, but more appropriately reflecting changes in use. This would include access to services in libraries but increasingly online and in other settings; other service locations, community venues and people's homes.
- 2.3. The remainder of this section describes, in detail, the proposed access to library services.

### eLibrary

- 2.4. The eLibrary has changed the way in which people are able to access library services, at any time, no matter where they are. By using the eLibrary, people can download reading materials, access information resources (including some resources that the Library and Information Service provides for free, but which people would have to pay for outside of the eLibrary), watch training videos or look up community information on ESCIS.
- 2.5. ESCIS, the East Sussex Community Information Service, is a website hosted by the Library and Information Service, providing up to date details of community organisations and events across East Sussex and Brighton & Hove. ESCIS can be accessed by anyone who can get online. Anyone wishing to access ESCIS within a library can do so, either by using the People's Network computers to visit the website or by asking a member of library staff to look up information for them.
- 2.6. The eLibrary also offers the ability to manage library loans more conveniently online between library visits. It provides the opportunity to 'click and collect', as with retailers, allowing people to search the library catalogue online and reserve items to collect from a library knowing they will be available, or to renew items for longer, reducing the need to visit a library as often.
- 2.7. Despite the potential benefits, however, the evidence suggests that awareness of the range of eLibrary services among the general population of East Sussex is still very low. There has been a lack of targeted promotion of

the eLibrary and support offered to help people with the skills to use it effectively.

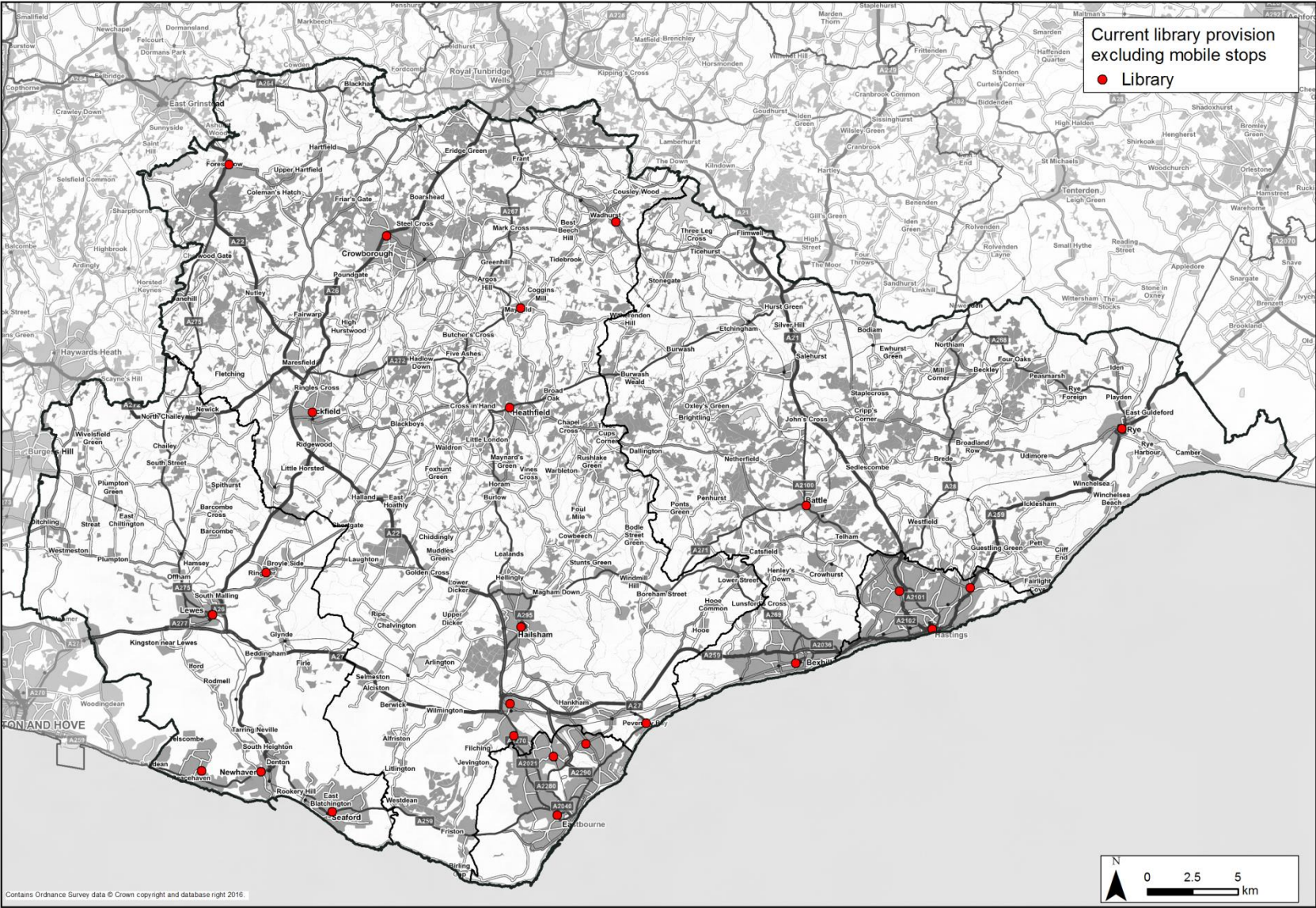
- 2.8 Although the eLibrary has the potential to serve a much wider cross-section of the local population than it does at present and use is increasing, we recognise that the shift toward online information, books and services is unlikely to replace the need either for library buildings or for printed reading materials altogether.
- 2.9 It is proposed, therefore, that the eLibrary continue to be enhanced, with an expanded range of materials and services and more targeted promotion, as an integral part of a modern library service for East Sussex. This will enable us to meet needs by responding increasingly to changes in consumer behaviour and in a way that is more cost effective for the service.

### **Library buildings**

- 2.10 By visiting a library, people are able to read or borrow books and access reliable sources of information, use computers, work or study and take part in literacy and training sessions. Although they remain the way that most people use the library service, fewer people are visiting libraries year on year.
- 2.11 Currently there is a network of 24 library buildings across East Sussex, as shown in **Map 1**, below.



Map 1 Current East Sussex library network



2.12 The draft Libraries Strategic Commissioning Strategy has determined that a smaller network of library buildings is required in order to provide a needs based library service, based upon the following considerations:

- National research of the types and duration of journey people make, which shows that a journey time of 20 to 25 minutes to a library by public transport and car is reasonable (see Technical Appendix 5, Accessibility Analysis, section 3).
- The availability of the eLibrary, as a modern and cost effective part of the library service, to support the services available in library buildings (see Technical Appendix 5, Accessibility Analysis, section 6)
- The different levels of need in communities across East Sussex and the potential for the Library and Information Service to deliver greater benefits where needs are greatest (see Technical Appendix 2, Needs Assessment).
- The overall resources available to provide the library service, along with the cost effectiveness of individual library buildings

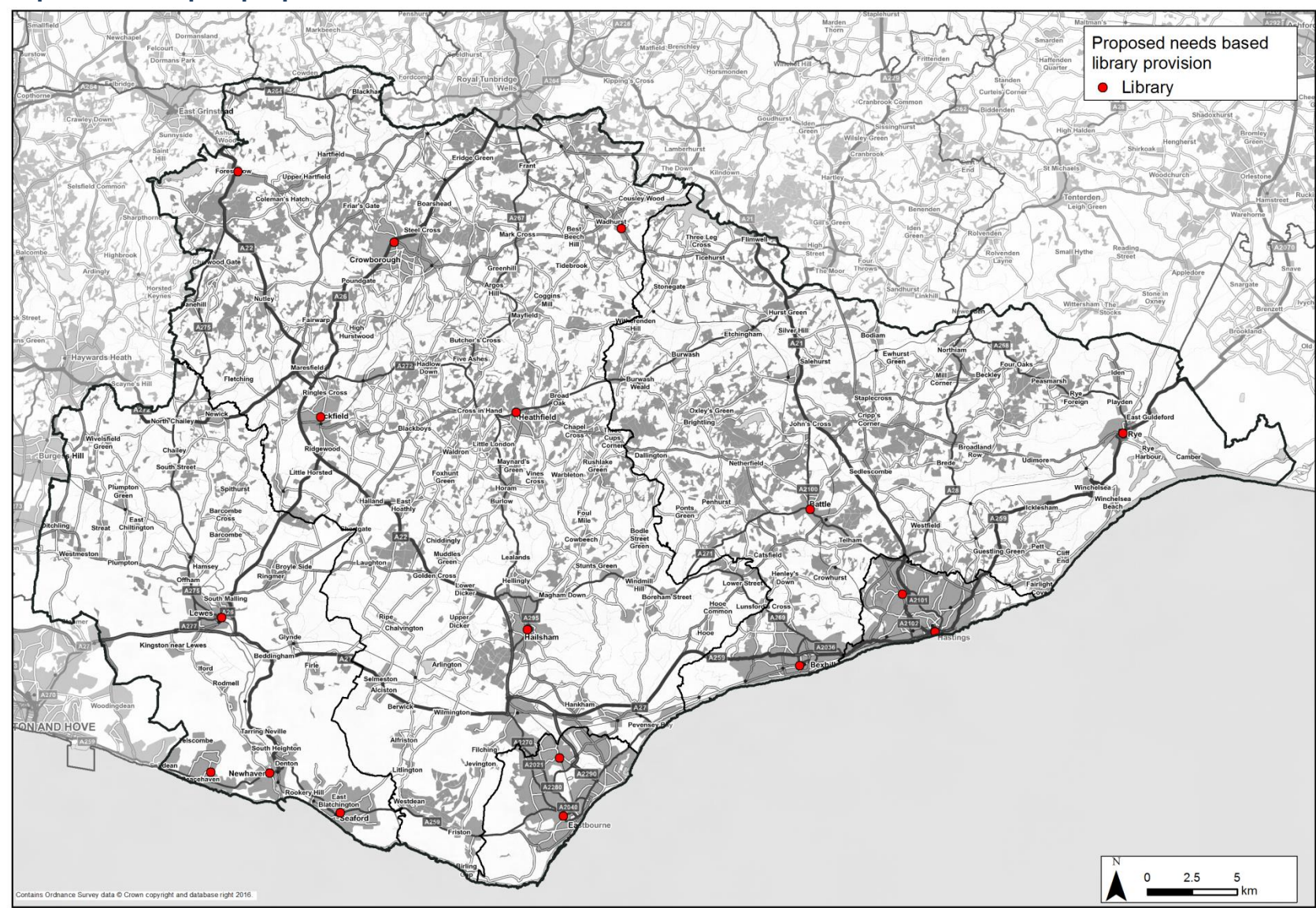
2.13 In the two larger urban areas of the county, Eastbourne and Hastings, where there are currently more libraries within a smaller geographic area, we have considered whether it is necessary to retain all of the libraries currently provided in order to meet the identified needs, or whether needs could still be met locally with fewer libraries. Where it is the case that needs could be met without all of the current libraries, we have considered which libraries would be best placed to deliver the service. In these cases, other factors have also been taken into account, such as the relative cost and condition of different buildings and opportunities to use the space within them more effectively. It is important to note, however, that the primary consideration of whether to retain a library or not is based on meeting identified needs.

2.14 Based on these considerations, we propose that 17 libraries would be retained from the current network of 24 libraries to provide a needs based library service, as shown in **Map 2**. These are, in alphabetical order:

- |                |              |
|----------------|--------------|
| ▪ Battle       | ▪ Hollington |
| ▪ Bexhill      | ▪ Lewes      |
| ▪ Crowborough  | ▪ Newhaven   |
| ▪ Eastbourne   | ▪ Peacehaven |
| ▪ Forest Row   | ▪ Rye        |
| ▪ Hailsham     | ▪ Seaford    |
| ▪ Hampden Park | ▪ Uckfield   |
| ▪ Hastings     | ▪ Wadhurst   |
| ▪ Heathfield   |              |



Map 2 Map of proposed network of libraries



- 2.15 Seven of our current 24 libraries would not be retained under the proposals. The following table summarises the rationale for each library.

**Table 1 Rationale for each of the seven libraries which are not proposed to be retained**

Library	Rationale
Langney	<p>The needs assessment shows high levels of need around both Langney and Hampden Park Libraries. The proximity of both libraries to each other and to Eastbourne Library means that it is possible to meet needs in Hampden Park and Langney by retaining one library and through the wider range of services provided in Eastbourne Library. Off-peak journey times from Langney Library to Hampden Park Library are 16 minutes by bus, or between 20 and 30 minutes to Eastbourne Library, and four minutes by car.</p> <p>Langney has a lower percentage (32%) of registered members aged under 16 compared to Hampden Park (37%) and the needs assessment identifies child literacy as one of the key needs which the Strategy is well-placed to address.</p> <p>The costs for Langney Library are relatively high because it is in a commercial retail unit within a shopping centre and the County Council pays rent for it, whereas Hampden Park Library is owned by the Council, so it has lower running costs.</p> <p>We propose to introduce Rhymetime, Storytime and Computer Buddy sessions at Hampden Park library to replace those which would cease to be provided at Langney Library.</p> <p>In addition to the provision of libraries in Hampden Park and Eastbourne, we propose to deliver an outreach service in Langney. A new children and family library offer would be provided in Shinewater Children's Centre, including free Rhymetime and Storytime sessions, free children's books swap and access to training for parents/carers.</p> <p>This targeted outreach service for children and families is identified by the needs assessment as being one of the groups which the Library and Information Service is well-placed to support and will help to achieve the Strategic Outcomes.</p>
Mayfield	<p>The needs assessment shows that, overall, Mayfield is in a very low area of need. The library is, therefore, not required in order to provide a library service which prioritises resources on need. Off-peak journey times from Mayfield Library to Heathfield Library are 12 minutes by bus and 9 minutes by car.</p>
Ore	<p>There are currently four libraries in Hastings, the main Hastings Library and Hastings Children's Library in the town centre, and two libraries in Ore and Hollington. Hastings main library is currently being refurbished and will reopen in the spring of 2018. In the meantime, a temporary library is being provided from Hastings Children's Library. When the main library reopens Hastings Children's Library will merge with it and will no longer be separate. It will provide state of the art library facilities, more public space, a new learning suite and other facilities.</p>

Library	Rationale
	<p>The needs assessment shows very high levels of need around Ore, Hollington and the Hastings main library. The proximity of all three libraries means that it is possible to meet needs in these communities by retaining the completely refurbished Hastings Library plus either Hollington or Ore libraries. Off-peak journey times from Ore Library to Hastings Library are 18 minutes by bus and six minutes by car.</p> <p>In addition to the provision of libraries in Hollington and Hastings, we propose to provide a new children and family library offer at East Hastings Children's Centre (situated in Ore), including free Rhymetime and Storytime sessions, free children's books swap and access to training for parents/carers.</p> <p>This targeted outreach service for children and families is identified by the needs assessment as being one of the groups which the Library and Information Service is well-placed to support and will help to achieve the Strategic Outcomes.</p>
Pevensey Bay	<p>The needs assessment shows that Pevensey Bay is not in a priority area of need. The library is, therefore, not required in order to provide a library service which prioritises resources on need.</p> <p>A new children and family library offer will be provided in Shinewater Children's Centre including free Rhymetime and Storytime sessions, free children's books swap and access to training for parents/carers.</p> <p>Off-peak journey times from Pevensey Bay Library to Eastbourne Library are 20 minutes by bus and 11 minutes by car to Hampden Park Library.</p>
Polegate	<p>The needs assessment shows that Polegate Library is not in a priority area of need. The library is, therefore, not required in order to provide a library service which prioritises resources on need.</p> <p>We propose to introduce Rhymetime, Storytime and Computer Buddy sessions at Hampden Park library to replace those which would cease to be provided at Langney Library and the loss of a Rhymetime session at Polegate Library.</p> <p>Frequent public transport links connect Polegate with Hampden Park, Eastbourne and Hailsham libraries. Off-peak journey times from Polegate Library to Eastbourne Library are 30 minutes by bus, or seven to 10 minutes by train, and seven minutes by car to Hailsham Library.</p>
Ringmer	<p>The needs assessment shows that Ringmer Library is in a very low area of need. The library is, therefore, not required in order to provide a library service which prioritises resources on need. Off-peak journey times from Ringmer Library to Lewes Library are 10 minutes by bus and nine minutes by car.</p>
Willingdon	<p>The needs assessment shows that Willingdon Library is not in a priority area of need. The library is, therefore, not required in order to provide a library service which prioritises resources on need.</p> <p>We proposed to introduce Rhymetime, Storytime and Computer Buddy sessions at Hampden Park library to replace those which would cease to</p>



Library	Rationale
Willingdon (cont)	<p>be provided at Langney Library and the loss of a Rhymetime session at Willingdon Library.</p> <p>Off-peak journey times from Willingdon Library to Eastbourne Library are 18 minutes by bus and six minutes by car to Hampden Park Library.</p>

- 2.16 In May 2017 there were 18,381 registered members for these seven libraries, representing a relatively small proportion, only 8%, of total registered members for the library service. **Table 4**, in Annex 1, provides a breakdown of the number of registered members for each of these seven libraries. Based on registered home addresses, our analysis shows that 100% of the members of these seven libraries live within a 20 minute journey time by car to one of the proposed 17 remaining libraries, and over 96% are within a 30 minute journey time by public transport.

### **Rural access (including Mobile Library Service and village library)**

- 2.17 74% of the population of East Sussex live in urban areas and 26% in rural areas, according to the 2011 Census. In developing these proposals, the needs of communities in more rural areas have been considered, where access to a library may be more limited than in urban areas, for example due to greater distances and fewer public transport options.
- 2.18 The Mobile Library Service has traditionally provided an alternative to travelling to a library building for more rural communities. The Mobile Library is a wheelchair accessible vehicle which offers a three weekly service to 88 stops across the county. Each stop lasts between 15 minutes and 2 hours and 10 minutes. The most frequent length of a stop is 30 minutes. The Mobile Library carries a stock of approximately 2,000 items.
- 2.19 There are 2,928 registered members of the Mobile Library Service, representing only 1% of total registered library users. If the rural libraries of Mayfield, Pevensey Bay and Ringmer, are added this equates to 5,757 registered members or 2.5% of total registered members.
- 2.20 At the majority of stops, the number of customers that access the mobile service is extremely low with 72 (81.8%) of the 88 stops having on average fewer than 10 customers per visit in 2016. Of these 72 stops, 34 stops had between 0 and 5 customers on average per visit. Twelve stops (13.6%) had between 10 to 15 customers on average per visit, whereas four stops (4.5%) had more than 20 customers on average per visit. These four stops were Westfield, Geary Place (21 customers), Groombridge, Village Hall (32 customers), Fairlight Cove, Shepherd's Way (35) and Ticehurst, Car Park (52 customers).
- 2.21 It is proposed that the Mobile Library Service is not retained as part of a needs based library service, given the limitations and the relative low use of Mobile Library stops. The proposed network of 17 libraries has been determined to

ensure reasonable journey times to libraries, by both public transport and car, across the whole county, for rural and urban areas alike. Increasingly, access to services using the eLibrary allows people to supplement visits to a library without the limitations of the frequency and duration of Mobile Library stops.

- 2.22 53 of the 88 Mobile Library stops (60.2%) are within a 10 minute drive of one of the proposed 17 libraries. On average seven customers use the Mobile Library at each of these stops. 35 stops (39.7%) are within a 20 minute drive. On average five customers use the Mobile Library at each of these stops. By public transport, 82 of the 88 Mobile Library stop locations are served by public transport to an alternative library building, on a day when the closest alternative library is open, of which 76 have a journey time of 30 minutes or under.
- 2.23 Six locations have journey times of more than 30 minutes by public transport, including Bodiam, Brede, Ditchling, Ewhurst Green, Hurst Green, and Wivelsfield. On average seven customers use the Mobile Library at each of these stops. From each of these locations it takes between 33 and 42 minutes by public transport to access a library within the proposed network of 17. **Table 5**, in Annex 1, provides a full breakdown of journey times to an alternative library from each of the 88 Mobile Library stops.
- 2.24 In four locations currently served by the Mobile Library (Bodle Street Green, Chiddingfold, Crowhurst Blacksmith's Field and Fairwarp) there is no public bus service, due to lack of demand, within a short walk of the Mobile Library stop. On average five customers use the Mobile Library in each of these locations. In two locations currently served by the Mobile library (Arlington and Ripe) the public bus runs on days of the week when the closest alternative library, Hailsham, is closed. On average, five customers use the Mobile Library each visit in Arlington and two in Ripe.
- 2.25 67% of those library customers registered to the Mobile Library currently use only the Mobile Library, and no other library building, to borrow items. There are a higher proportion of older library users, aged over 75, of the Mobile Library than other libraries. For the Mobile Library user group as a whole, therefore, we recognise that the ability to travel to another library or the likelihood that this group would be able to use the eLibrary is more limited.
- 2.26 The Library and Information Service also supports one 'village library', or community book swap, in Northiam. The village library is within the Northiam Village Club and offers a limited selection of books to the local community from 2pm to 4pm on Thursday and Saturday each week, with the supervision of a volunteer. Three book exchanges are provided each year by the Library and Information Service, with approximately 500 books available at each exchange. A village library was also provided in Sedlescombe, until May 2017, but was discontinued at the request of the Village Hall Committee.
- 2.27 It is also proposed that the library service will no longer provide an exchange of materials to Northiam Village Library. The eLibrary is considered to be a more modern and cost effective way to meet the needs of rural communities

with reasonable journey times to libraries. Off-peak journey times from Northiam Village Library to Rye Library are 19 minutes by bus and 28 minutes by car.

- 2.28 As we implement the draft Libraries Strategic Commissioning Strategy, we would look to help mitigate for the impact of the proposals by supporting community led solutions, so long as we are able to provide them within available resources. We would provide a new library membership category so that recognised members from the local community, for example a member of a Town or Parish Council or someone assigned on their behalf, would be issued with a library card that would allow them to borrow a large number of items from the library to make available within a community setting.
- 2.29 The following further provisions, to mitigate for the impact on library users who will have to travel further in order to visit the nearest library as a result of the withdrawal of the Mobile Library and Northiam Village Library, have also been identified:
- New, volunteer provided, Computer Buddy sessions will be available in libraries to promote the eLibrary service and to help library users develop skills and confidence to use it.
  - A book drop facility will be provided at each of the proposed 17 libraries, so that loaned items can be returned even if the library is closed, meaning that people will not be fined for later returns.
  - Those who are unable to use an alternative library, due to ill-health, disability or caring responsibilities, will be eligible to use the Home Library Service.



## 3 Impacts of the proposals

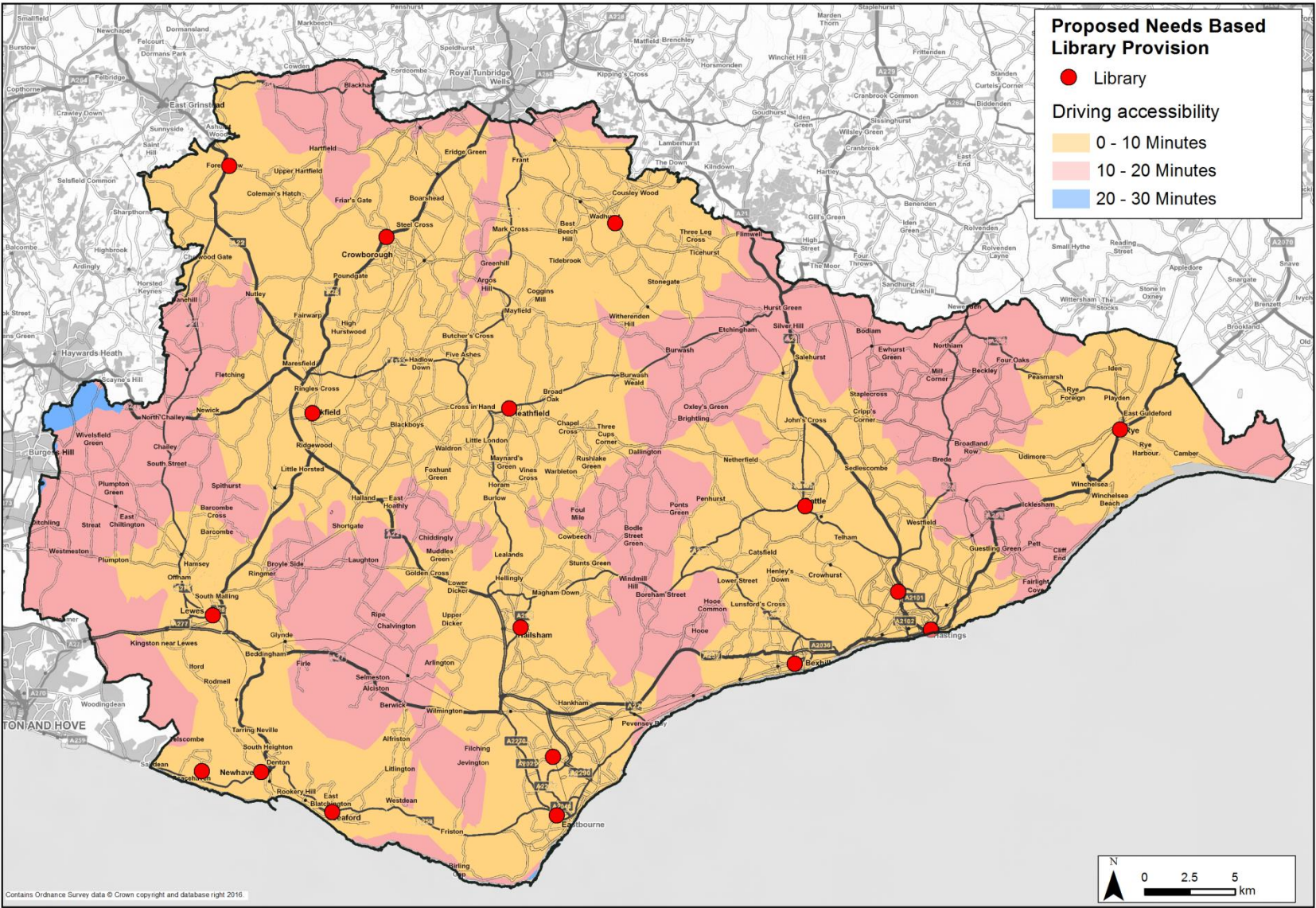
### Impacts of the proposals and further mitigations

- 3.1 Journey times for the population of East Sussex to the proposed network of 17 libraries by public transport, driving and walking have been analysed and the results are shown in **Maps 3 to 5**, below. For each map journey times are broken down into intervals of 0-10, 10-20 and 20-30 minutes<sup>1</sup>.

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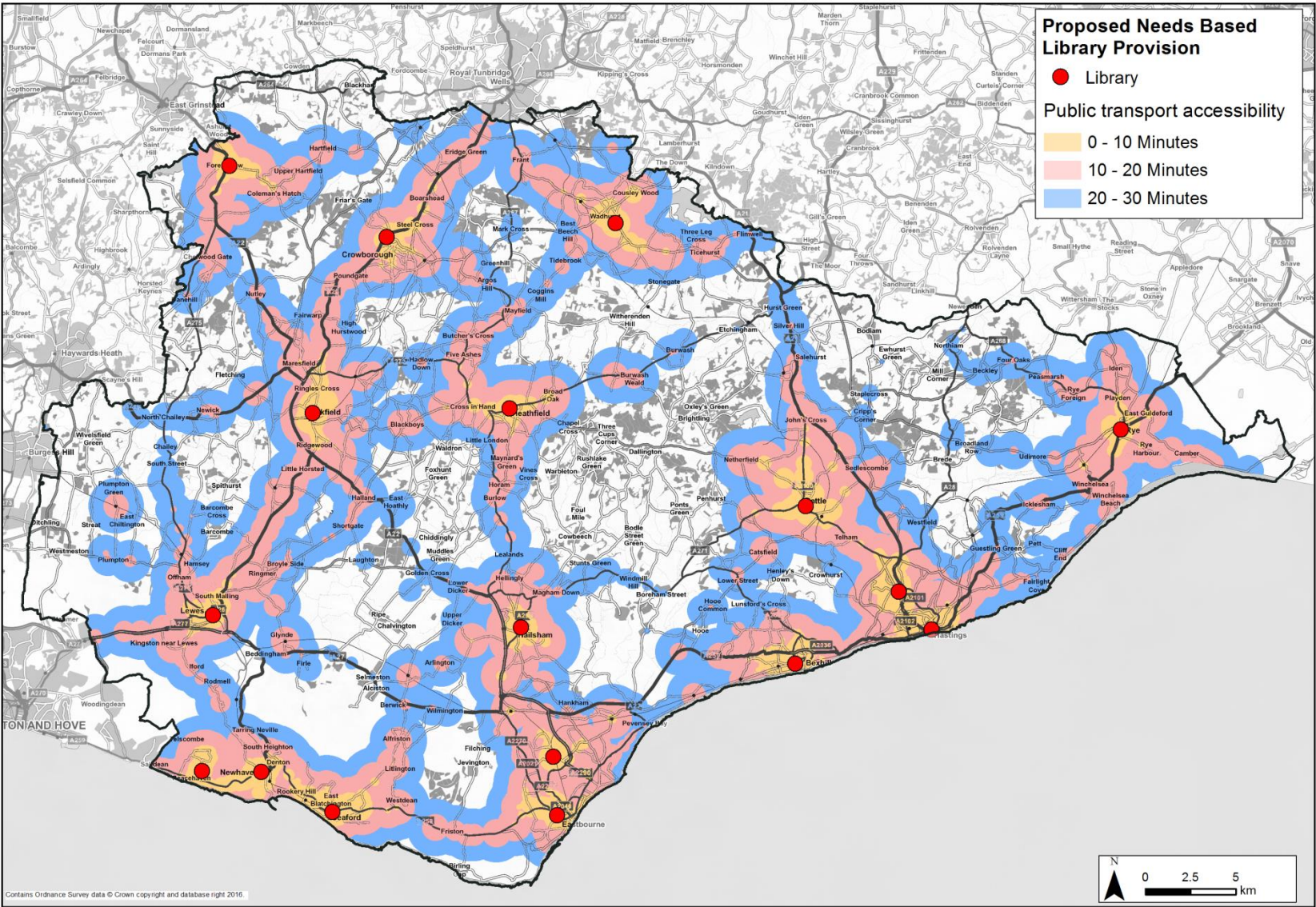
<sup>1</sup> 0-10 minutes is 0 to 9 minutes and 59 seconds; 10-20 minutes is 10 minutes to 19 minutes and 59 seconds, 20-30 minutes is 20 Minutes to 29 minutes and 59 seconds.

Map 3 Proposed needs based library provision, driving accessibility within 30 minutes



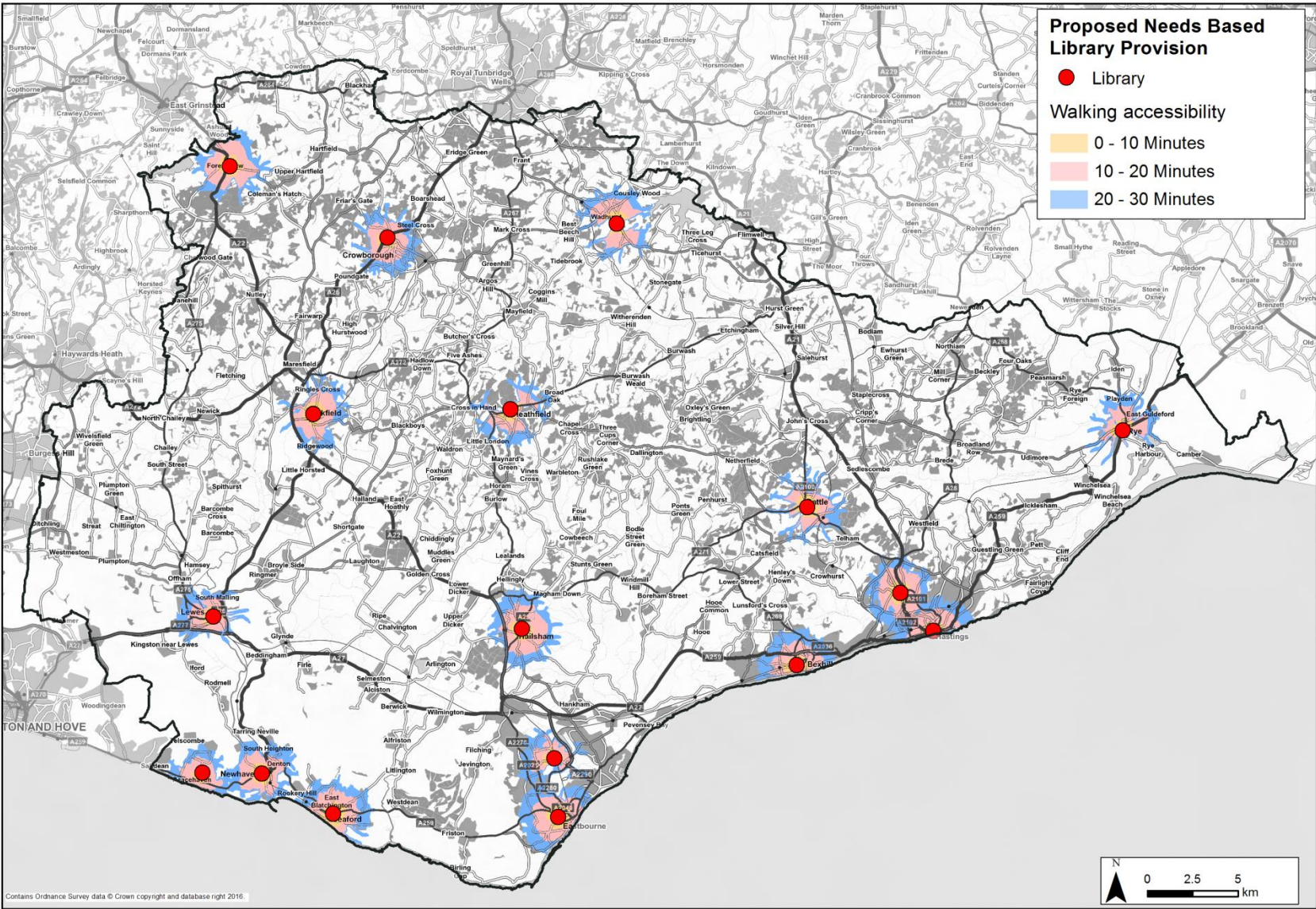


Map 4 Proposed needs based library provision, public transport accessibility within 30 minutes





Map 5 Proposed needs based library provision, walking accessibility within 30 minutes



- 3.2 The overall impact of the proposed network of 17 libraries on library users would be that 8% of registered members would no longer be able to access the library that they are currently registered to. This means that 92% of all library users are largely unaffected by the proposals.
- 3.3 **Table 2** shows the percentage of the total population and **Table 3** the cumulative population totals for East Sussex within a 10, 20 and 30 minute journey time of a library by car, public transport, and walking. The percentage calculations are based on a total population of 527,521, in the 2011 Census.

**Table 2 Population totals within half an hour journey time to libraries (proposed and current)**

		Journey time in minutes								
		Public Transport			Driving			Walking		
		0-10	10-20	20-30	0-10	10-20	20-30	0-10	10-20	20-30
No. of residents within journey time	Current library network & Mobile Library	380,428	131,466	12,448	527,108	413	0	119,851	180,616	160,338
	Current library network only	307,975	161,783	37,461	496,817	29,982	722	86,113	170,113	140,967
	Proposed library network	241,980	212,384	50,487	482,621	44,178	722	65,532	138,459	105,396
% of residents within journey time	Current library network & Mobile Library	72.1%	24.9%	2.4%	99.9%	0.1%	0.0%	22.7%	34.2%	30.4%
	Current library network only	58.4%	30.7%	7.1%	94.2%	5.7%	0.1%	16.3%	32.2%	26.7%
	Proposed library network	45.9%	40.3%	9.6%	91.5%	8.4%	0.1%	12.4%	26.2%	20.0%

**Table 3 Cumulative population totals within half an hour journey time to libraries (proposed and current)**

		Journey time in minutes								
		Public Transport			Driving			Walking		
		0-10	0-20	0-30	0-10	0-20	0-30	0-10	0-20	0-30
No. of residents within journey time	Current library network & Mobile Library	380,428	511,894	524,342	527,108	527,521	527,521	119,851	300,467	460,805
	Current library network only	307,975	469,758	507,219	496,817	526,799	527,521	86,113	256,226	397,193
	Proposed library network	241,980	454,364	504,851	482,621	526,799	527,521	65,532	203,991	309,387
% of residents within journey time	Current library network & Mobile Library	72.1%	97.0%	99.4%	99.9%	100.0%	100.0%	22.7%	57.0%	87.4%
	Current library network only	58.4%	89.1%	96.2%	94.2%	99.9%	100.0%	16.3%	48.6%	75.3%
	Proposed library network	45.9%	86.1%	95.7%	91.5%	99.9%	100.0%	12.4%	38.7%	58.6%

3.4 Overall, the proposals mean that 95.7% of East Sussex residents would be able to get to a library within half an hour by public transport (bus or train) and 100% by car. The current network of 24 libraries enables 96.2% of the population to get to a library within half an hour by public transport and 100% by car. If current Mobile Library stops are included, 99.4% are currently able to get to a library within half an hour by public transport and 100% by car.

3.5 The proposals mean that 86.1% of the population would be within a 20 minute journey time by public transport and 99.9% within a 20 minute journey by car. There would, therefore, continue to be a very high level of accessibility to a library within a reasonable travel time of 20 to 25 minutes by either mode. This compares with 89.1% by public transport and 99.9% by car for the current network of 24 libraries or 97% by public transport and 100% by car if current Mobile Library stops are included.

3.6 The largest impact would be on those walking to libraries. The current network of 24 libraries and Mobile Library stops enables 87.4% of the population to walk to a library within half an hour. Without Mobile Library stops, currently 75.3% of the population are able to walk to a library within 30 minutes. 58.6% of the population would still be able to walk to a library within

30 minutes with the proposed network of 17 libraries and without the Mobile Library.

- 3.7 The current network of 24 libraries and Mobile Library stops enables 57.0% of the population to walk to a library within 20 minutes and 22.7% within 10 minutes. Without Mobile Library stops, currently 48.6% of the population are able to walk to a library within 20 minutes and 16.3% within 10 minutes. 38.7% would still be able to walk to a library within 20 minutes and 12.4% within 10 minutes, with the proposed network of 17 libraries and without the Mobile Library.
- 3.8 The analysis presents journey times to a library of the whole population of East Sussex, not only library users, to travel to a library. This is necessary in order to assess the ability of the service to meet the terms of the statutory duty to provide a comprehensive and efficient library service. It also based on an assumption that people will travel to the nearest library to their home. We know, from data on library users' home postcodes and where they have borrowed materials from, that this is not necessarily the case.
- 3.9 There are a number of other relevant considerations about journeys to libraries:
- People will commonly travel to libraries as part of combined trips to do other things, such as shopping or when they are at work
  - 66% of East Sussex library users visit a library between once or twice a week and once a fortnight, compared to 5% who visit daily
  - 55% of library users who were visiting a particular library also visit another library, including the Mobile Library
  - The most popular 'other' library visited was Eastbourne, which was visited as an additional library by 16% of library users
  - Only 23% of library users also used the eLibrary
  - Only 35% of library users only used one library and no other service
- 3.10 A draft Equalities Impact Assessment (EqIA) has been undertaken to identify those groups with protected characteristics who it is considered might be more affected than others by the proposals not to retain seven libraries and to not continue to provide the Mobile Library Service and Northiam village library. The draft EqIA identified three main groups who it is considered might be more affected by the proposals, as follows:
- Those aged 75 and over
  - Those with certain disabilities
  - Those in rural communities

- 3.11 Those aged 75 and over and those with certain disabilities were primarily identified for a common reason, in that they are likely to be less able to travel further to an alternative library and in some cases may be lacking the digital skills or technology to access the services via the eLibrary.
- 3.12 People aged 75 and over who, due to their age, are likely to be more affected by the proposals due to reduced mobility and therefore may find it harder to travel further to an alternative library. This age group are least likely to access the eLibrary due to a lack of digital skills and therefore may be unable to access the service in this way, without additional support. For those customers in this age group who are unable to visit an alternative library, due to frailty or mobility issues, the Home Library Service would be a suitable alternative way to access the service.
- 3.13 People with certain disabilities are likely to be more affected by the proposals due to the likelihood of being unable to travel further to an alternative library building, either on foot, by public transport or car. The proposed changes also have the potential to impact those people with certain disabilities who, as a result of those disabilities, have to rely on a personal helper who may not be able to travel one of the alternative libraries. For those individuals unable to access a library themselves due to mobility issues, illness or their caring responsibilities, the Home Library Service is available. Current Home Library Service volunteers and customers that may be impacted by the proposals will be contacted during the consultation period to ensure that existing volunteers are able to access an alternative library to collect books, or alternatively, customers will be matched with a different volunteer. Some existing volunteers are waiting to be matched with a customer. Our eLibrary is also available 24 hours a day and advice and training on how to use the eLibrary will continue to be offered to customers of those libraries not included in the proposed future network prior to closure.
- 3.14 People in rural communities are likely to be more affected by the proposals if they use the Mobile Library Service, Northiam village library or Mayfield, Ringmer and Pevensey Bay libraries. However for those that have access to a car or are able to travel by public transport to an alternative library, the majority of the county would still be able to access the library in reasonable travel times. In addition, the eLibrary is available 24 hours a day which can enable customers to visit libraries less frequently as well as access a range of online materials. For those individuals in rural locations that are unable to travel to an alternative library themselves due to mobility issues, illness or their caring responsibilities, the Home Library Service is available.



## Annex 1

**Table 4**, below, shows the nearest alternative library, by journey time rather than distance, from each of the seven libraries which are proposed not to be retained.

**Table 4      Nearest alternative library from each of the seven libraries, based on journey time**

Library	Registered members	Active users	Nearest alternative library (by public transport)	Public transport journey time	Route	Nearest alternative library (by car)	Car journey time
Langney	6,145	1,609	Eastbourne Hampden Park	20 or 30 minutes to Eastbourne 16 minutes to Hampden Park	1,1A,1X, twice an hour, and The Loop, up to 12 times per hour, to Eastbourne. The Loop, up to 4 journeys per hour, to Hampden Park	Hampden Park	4 minutes
Mayfield	680	219	Heathfield	12 minutes	251/252, up to 2 journeys per hour	Heathfield	9 minutes
Ore	3,174	747	Hastings	18 minutes	2, 22A, 28, 100, 101, 7 journeys per hour in total	Hastings	6 minutes
Pevensey Bay	1,683	473	Eastbourne	20 minutes	99, up to 3 journeys per hour	Hampden Park	11 minutes

Library	Registered members	Active users	Nearest alternative library (by public transport)	Public transport journey time	Route	Nearest alternative library (by car)	Car journey time
Polegate	3,880	1,434	Eastbourne Hailsham	33 minutes to Eastbourne 12 minutes to Hailsham 7 to 10 minutes by train to Eastbourne	51, 54, 98, up to 4 journeys per hour, to Eastbourne or Hailsham  Train, up to four journeys per hour, to Eastbourne	Hailsham	7 minutes
Ringmer	466	228	Lewes	10 minutes	28, up to 2 journeys per hour	Lewes	9 minutes
Willingdon	2,353	810	Eastbourne	18 minutes	51, 54, 98, up to 4 journeys per hour	Hampden Park	6 minutes

**Table 5**, below, shows the nearest alternative library, by journey time rather than distance, from each of the 88 libraries mobile library stops. It is proposed to cease the Mobile Library Service.

**Table 5      Nearest alternative library from each of the 88 Mobile Library stops, based on journey time**

Mobile Library stop	Average number of visitors per stop	Next nearest library (by public transport)	Public transport journey time	Route	Next nearest library (by car)	Car journey time
Alfriston, Deans Road	8	Seaford	10 minutes	Service 126	Seaford	7 minutes
Arlington, Village Hall	5	Hailsham	14 minutes	Service 42 (Wednesday only, when library is closed)	Hailsham	9 minutes
Ashburnham, Church Road	4	Battle	15 minutes	Service B79	Battle	10 minutes
Barcombe, Weald View	8	Lewes	20 minutes	Service 122	Lewes	10 minutes
Beckley, Village Hall	9	Rye	20 minutes	Service 313	Rye	13 minutes
Bells Yew Green, Rushlye Close	2	Wadhurst	19 minutes	Service 256	Wadhurst	9 minutes
Berwick, Village Hall	0	Seaford (Eastbourne and Lewes)	32 minutes (9 to 14 minutes by train)	Service 40 (or train to Eastbourne or Lewes)	Seaford	12 minutes
Bexhill, Cowdray Park	12	Bexhill	20 minutes	Service 94 or 96	Bexhill	7 minutes
Blackboys, Mount Pleasant	9	Uckfield	15 minutes	Service 231	Heathfield	8 minutes
Bodiam, Levetts Lane	1	Hastings	42 minutes	Service 349	Battle	15 minutes
Bodle Street Green, Village Hall	6	Uckfield	15 minutes, Community Transport	No public bus due to lack of demand. Community transport available, upon request	Hailsham	13 minutes
Brede, Village Hall	7	Hastings	33 minutes	Service 2	Hollington	13 minutes
Brightling, Village Hall	6	Battle	12 minutes	Service 225	Battle	11 minutes
Broad Oak, Brede, Reedswood Road	9	Rye	20 minutes	Service 326	Rye	13 minutes
Burwash Weald, Scout Hall	8	Heathfield	14 minutes	Service 231	Heathfield	8 minutes
Burwash, Christ the King	6	Heathfield	19 minutes	Service 231	Heathfield	12 minutes

Mobile Library stop	Average number of visitors per stop	Next nearest library (by public transport)	Public transport journey time	Route	Next nearest library (by car)	Car journey time
Burwash, Rother View	6	Heathfield	22 minutes	Service 231	Wadhurst	12 minutes
Buxted, Buxted Court, Gordon Road	5	Uckfield	24 minutes	Service 248	Uckfield	7 minutes
Camber, Castle Public House	3	Rye	26 minutes	Service 100 or 101	Rye	9 minutes
Catsfield, Village Hall	5	Battle	15 minutes	Service 95	Battle	5 minutes
Chailey, Markstakes Corner	7	Lewes	26 minutes	Service 121	Lewes	13 minutes
Chelwood Gate, Village Hall	9	Forest Row	8 minutes	Service 270	Forest Row	8 minutes
Chiddingly, School	6	Uckfield	15 minutes, Community Transport	No public bus due to lack of demand. Community transport available upon request	Hailsham	10 minutes
Cooksbridge, Little Mead	5	Lewes	12 minutes	Service 121 or 122	Lewes	7 minutes
Cripps Corner, Northside Yard	3	Hastings	30 minutes	Service 349	Battle	9 minutes
Crowhurst, Blacksmith's Field	1	Hastings	25 minutes, Community Transport	No public bus due to lack of demand and train station is not within walking distance. Community Transport available upon request	Hollington	8 minutes
Crowhurst, Station Car Park	0	Hastings	13 minutes	Train No public bus due to lack of demand. Community Transport available upon request	Hollington	10 minutes
Dallington, Village Hall	11	Uckfield	27 minutes	Service 249	Heathfield	11 minutes
Danehill, Oak Tree Cottages	1	Forest Row	20 minutes	Service 270	Forest Row	10 minutes
Deanland, Mobile Home Park	13	Hailsham	20 minutes	Service 143	Hailsham	11 minutes
Ditchling, Dumbrell's Court	9	Lewes	42 minutes	Service 167	Lewes	16 minutes
East Dean, Village Hall	13	Eastbourne	12 minutes	Service 12/12X	Eastbourne	8 minutes

Mobile Library stop	Average number of visitors per stop	Next nearest library (by public transport)	Public transport journey time	Route	Next nearest library (by car)	Car journey time
East Hoathly, Church	8	Uckfield	15 minutes	Service 54	Uckfield	11 minutes
Etchingham, Village Hall	15	Heathfield	21 minutes	Service 231	Battle	15 minutes
Ewhurst, Village Street	4	Hastings	36 minutes	Service 349	Battle	14 minutes
Fairlight Cove, Shepherd's Way	35	Rye (or Hastings)	15 minutes (or 20 minutes)	Service 101	Hastings	12 minutes
Fairwarp, Foresters Arms	6	Uckfield	15 minutes, Community Transport	No public bus due to lack of demand. Community transport available upon request	Crowborough	8 minutes
Firle, opposite Post Office	8	Lewes	16 minutes	Service 125	Lewes	9 minutes
Flimwell, opposite Longbranch	3	Wadhurst	19 minutes	Service 254	Wadhurst	10 minutes
Framfield, Beckett's Way	5	Uckfield	9 minutes	Service 231	Uckfield	5 minutes
Framfield, Framelle Mount	1	Uckfield	10 minutes	Service 231	Uckfield	5 minutes
Frant, Village Hall	8	Wadhurst	13 minutes	Service 254	Wadhurst	9 minutes
Groombridge, The Ridge	6	Forest Row	22 minutes	Service 291	Crowborough	10 minutes
Groombridge, Village Hall	32	Forest Row	23 minutes	Service 291	Crowborough	10 minutes
Hailsham East, Community Centre	3	Hailsham	12 minutes	Service H1	Hailsham	4 minutes
Hartfield, Castle Fields	6	Forest Row	12 minutes	Service 291	Forest Row	10 minutes
Herstmonceux, Ridgeway	6	Hailsham	18 minutes	Service 98	Hailsham	10 minutes
Hooe, opposite Denbigh Court	9	Bexhill	20 minutes	Service 97	Bexhill	11 minutes
Horam, Horebeech Lane	12	Heathfield	18 minutes	Service 51	Heathfield	7 minutes
Hurst Green, Village Hall	6	Wadhurst	35 minutes	Service 254	Battle	12 minutes
Icklesham, Old Post Office	6	Rye	14 minutes	Service 100	Rye	10 minutes
Iden, Village Hall	3	Rye	8 minutes	Service 312	Rye	6 minutes
Laughton, School	2	Lewes	21 minutes	Service 143	Hailsham	12 minutes
Maresfield, Village Hall	2	Uckfield	9 minutes	Service 31	Uckfield	6 minutes
Mark Cross, Mark Cross Inn	4	Heathfield	19 minutes	Service 251	Wadhurst	7 minutes

Mobile Library stop	Average number of visitors per stop	Next nearest library (by public transport)	Public transport journey time	Route	Next nearest library (by car)	Car journey time
Mountfield, Hoath Hill	4	Battle	9 minutes	Services B71-B75	Battle	5 minutes
Netherfield, Netherfield Stores	4	Battle	9 minutes	Service 225/B72/B74/B75	Battle	7 minutes
Newick, South Rough	8	Uckfield	18 minutes	Service 31	Uckfield	10 minutes
Ninfield, Downsview	10	Bexhill	19 minutes	Service 98	Battle	8 minutes
Normans Bay, Caravan Park	12	Bexhill	9 minutes	Train No public bus due to lack of demand	Bexhill	10 minutes
Northiam, Station Road, opposite The Paddock	5	Rye	22 minutes	Service 313	Rye	17 minutes
Nutley, Fords Green layby	6	Uckfield	14 minutes	Service 261	Uckfield	11 minutes
Peasmarsh, Memorial Hall	6	Rye	9 minutes	Service 313	Rye	8 minutes
Pett, Church of England	14	Hastings	25 minutes	Service 347	Hastings	11 minutes
Playden, Poppyfields	1	Rye	7 minutes	Service 312 or 313	Rye	5 minutes
Plumpton, Village Hall	6	Heathfield	8 minutes	Service 225	Lewes	14 minutes
Punnetts Town, opposite the School	2	Heathfield	8 minutes	Service 225	Heathfield	5 minutes
Ripe, opposite Lamb Inn	2	Hailsham	19 minutes	Service 42 (Wednesdays only, when library is closed)	Hailsham	13 minutes
Robertsbridge, near George Inn	7	Battle	16 minutes	Service 304 or 305	Battle	8 minutes
Rotherfield, The School	6	Crowborough	12 minutes	Service 224/225/226	Crowborough	8 minutes
Rye, Tilling Green	2	Rye	5 minutes	Service 326	Rye	3 minutes
Sedlescombe, Park Shaw	15	Hastings	25 minutes	Service 349	Battle	7 minutes
Selmeston, Village Hall	6	Lewes	19 minutes	Service 125	Polegate	11 minutes
St Leonards, Bulverhythe Road	4	Hastings	15 minutes	Service 98 or 99	Hollington	7 minutes
Staplecross, Cricketers Field	2	Hollington	25 minutes	Service 349	Battle	11 minutes

Mobile Library stop	Average number of visitors per stop	Next nearest library (by public transport)	Public transport journey time	Route	Next nearest library (by car)	Car journey time
Stonegate, Village Hall	10	Battle	16 minutes	Train No public bus due to lack of demand.	Wadhurst	6 minutes
Three Oaks, Village Hall	7	Rye	10 minutes	Train No public bus due to lack of demand.	Hollington	10 minutes
Ticehurst, Car Park	52	Wadhurst	16 minutes	Service 254	Wadhurst	6 minutes
Udimore, Village Hall	8	Rye	15 minutes	Service 326	Rye	9 minutes
Wadhurst, Durgates	2	Wadhurst	6 minutes	No public bus due to lack of demand. Service 254 is a 5 minute walk and then a 6 minute journey to Wadhurst	Wadhurst	2 minutes
Wannock, Village Hall	7	Eastbourne	23 minutes	Service 125 or 143	Hampden Park	8 minutes
Westfield, Geary Place	21	Hastings	28 minutes	Service 2	Hollington	8 minutes
Wilmington, Ades Field	2	Eastbourne	30 minutes	Service 125	Polegate	5 minutes
Winchelsea Beach, opposite Windmill Way	7	Rye	11 minutes	Service 101	Rye	7 minutes
Winchelsea, Castle Street	6	Rye	9 minutes	Service 100	Rye	5 minutes
Windmill Hill, Hurst Lane	7	Hailsham	21 minutes	Service 98	Hailsham	11 minutes
Withyham, Dorset Arms	4	Forest Row	16 minutes	Service 291	Crowborough	10 minutes
Wivelsfield Green, Village Hall	15	Lewes	33 minutes	Service 166	Uckfield	19 minutes

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# Equality Impact Assessment

## Project or Service Template

Name of the proposal, project or service
<b>Schools Basic Need Capital Programme</b>

File ref:	Schools Basic Need Capital Programme 2018/19 to 2022/23	Issue No:	1.0
Date of Issue:	December 2016	Review date:	

### Contents

Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA).....	2
Part 2 – Aims and implementation of the proposal, project or service.....	4
Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics. ....	8
Part 4 – Assessment of impact.....	9
Part 5 – Conclusions and recommendations for decision makers.....	22
Part 6 – Equality impact assessment action plan.....	24

## **Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)**

**1.1** The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

**1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.**

### **1.3 The Public Sector Equality Duty (PSED)**

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- 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. (see below for “protected characteristics”)

These are sometimes called equality aims.

### **1.4 A “protected characteristic” is defined in the Act as:**

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

### **1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:**

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21st Century Families and Communities, 2008]
- Literacy/Numeracy Skills
- Part time workers
- Rurality

### **1.6 Advancing equality (the second of the equality aims) involves:**

- Removing or minimising disadvantages suffered by people due to their protected characteristic

## Equality Impact Assessment

- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

### **1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:**

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 *Some key points to note :*

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.
- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

## **Part 2 – Aims and implementation of the proposal, project or service**

### **2.1 What is being assessed?**

#### **a) Proposal or name of the project or service.**

Schools Basic Need Capital Programme 2018/19 to 2022/23

#### **b) What is the main purpose or aims of proposal, project or service?**

Over the period to 2022/23 the Local Authority is predicting that the number of children attending state-funded primary schools in East Sussex will grow to approximately 40,000 (an increase of 6% on 2015/16 figures).

The Local Authority expects the number of young people attending state-funded secondary schools in East Sussex, which has been falling in recent years, to rise to approximately 30,100 by 2022/23 (an increase of 16% on 2015/16 figures). Numbers will then continue to grow, reflecting the higher intakes coming through from the primary phase.

In addition, and based on the latest SEND pupil forecasts, there is a need for a further 197 special school places by 2023/24 across the following three need types:

PMLD and ASD – 117 places  
SEMH – 80 places

The Local Authority has a statutory duty to ensure there are sufficient, high quality education places in the county to meet present and future demand across all phases of education. The Schools Basic Need Capital Programme enables the Local Authority to deliver new places in the areas of greatest demand.

#### **c) Manager(s) and section or service responsible for completing the assessment**

Gary Langford, Place Planning Manager, Standards and Learning Effectiveness Services, Children's Services Department

### **2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?**

Local children and their families

The Local Authority

### **2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?**

The Local Authority will work in partnership with schools, academy trusts, dioceses, project teams and other key partners to deliver the programme. The programme is overseen by the Schools sub Capital Board which reports to the Capital and Asset Strategy Board. Where applicable, the Lead Member for Education and Inclusion, Special Educational Needs and Disability will make final decisions on individual proposals following consultation with key stakeholders.

### **2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?**

## Equality Impact Assessment

The Local Authority engages with groups of schools, academy trusts, dioceses and district councils in drawing up proposals for school expansions and/or the establishment of new schools.

### **2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?**

Local authorities are under a statutory duty to ensure the sufficiency of school places in their area.

Where a Local Authority identifies the need for a new school, to meet basic need, section 6A of EIA 2006 places the Local Authority under a duty to seek proposals to establish an academy (free school) via the 'free school presumption'. The Local Authority is responsible for providing the site for the new school and meeting all associated capital and pre-/post-opening revenue costs. All new free school presumption proposals require the Regional Schools Commissioner's approval (on behalf of the Secretary of State) as it is the Secretary of State who will enter into a funding agreement with the academy trust/sponsor.

If the free school presumption does not result in a suitable proposal, a statutory competition can be held under 'section 7' of EIA 2006. This will not require a separate application for approval, since the Secretary of State will inform the Local Authority that approval to hold a competition is given at the same time as informing the Local Authority that no suitable free school was identified.

Free school presumption proposals and proposals for foundation, foundation special and voluntary schools can be submitted into the competition. However the Regional Schools Commissioner will consider any free school proposals first when making a decision on the case.

Any persons ('proposer') e.g. Local Authority or diocese may publish a proposal, at any time, for a new school outside of the free school presumption and competitions process under section 11 of EIA 2006. The Secretary of State's consent is not required in the case of proposals for:

- a new community or foundation primary school to replace a maintained infant and a maintained junior school;
- a new voluntary-aided school in order to meet demand for a specific type of place e.g. places to meet demand from those of a particular faith;
- a new foundation or voluntary school resulting from the reorganisation of existing faith schools in an area, including an existing faith school losing or changing its religious designation;
- a new foundation or community school, where there were no suitable free school proposals and a competition has been held but did not identify a suitable provider;
- a former independent school wishing to join the maintained sector; and
- a new Local Authority maintained nursery school.

The proposer should be able to demonstrate to the decision-maker a clear demand for the places the new school will provide.

Local authorities wishing to propose expansion of a community, foundation or voluntary school can do so by following a statutory process set out in the School Organisation (Prescribed Alterations to Maintained School) (England) Regulations 2013.

## Equality Impact Assessment

Academies wishing to expand must follow a separate process. Decisions on academy expansions are taken by the Regional Schools Commissioner or the Secretary of State as appropriate.

The Education Commissioning Plan (ECP) 2015 to 2019 sets out how the Local Authority, as a strategic commissioner of education, seeks to meet the challenge of ensuring there are sufficient education places for all children from two to 19 years of age. The plan is produced by the Standards and Learning Effectiveness Service in the Children's Services Department and was approved for publication by the Lead Member for Learning and School Effectiveness on 21 December 2015.

Proposals for new schools and school expansions will be based on information contained in the ECP which is updated every two years. The ECP is informed by the Local Authority's pupil forecasting model which is revised annually taking account of the following factors:

- existing and planned capacities of school places as well as published intake numbers
- existing numbers of pupils in schools (from pupil census data)
- future births and resulting primary reception numbers
- parental preference for primary and infant reception year, junior year 3 and secondary year 7 places as expressed through the school admission system
- transfer (cohort survival) rates between school year groups
- transfers and transfer rates between infant and junior and primary and secondary schools
- staying-on rates into sixth forms
- additional pupils arising from new housing development in each area.

### **2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.**

The ECP is available on the East Sussex County Council website at:

<https://new.eastsussex.gov.uk/educationandlearning/management/download>

### **2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.**

n/a

### **2.8 How, when and where is your proposal, project or service provided? Please explain fully.**

The following areas of basic need have been identified and, subject to funding being secured through the capital programme, the Local Authority aims to deliver additional school places in these areas during the 2018/19 to 2022/23 capital programme period.

#### Primary places

- Hailsham – 420 additional places
- Polegate / Willingdon – 210 additional places

## Equality Impact Assessment

- Bexhill – 210 additional places
- Frant – 35 additional places
- Uckfield – 210 additional places

### Secondary places

- Eastbourne – 240 additional places
- Hastings – 60 additional places
- Newhaven/Peacehaven – 210 places
- Seaford – 150 places
- Hailsham – 300 places
- Willingdon – 150 places
- Uckfield – 150 places

### Special school places

- Eastbourne/Hastings – 196 additional places

In addition to the provision of permanent places, where pupil growth is identified as a short term issue, a 'bulge' in pupil numbers, the Local Authority will use temporary accommodation to ensure it can react quickly to provide additional places in areas of pressure. Using temporary accommodation is a recognised way of providing additional places in the short term and it provides a valuable and flexible resource to enable the Local Authority to fulfil its obligations.

An annual programme of Temporary Accommodation will be funded from the Schools Basic Need Capital Programme between 2018/19 and 2022/23 to facilitate this.

## Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

### 3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

Types of evidence identified as relevant have <b>X</b> marked against them			
	Employee Monitoring Data		Staff Surveys
	Service User Data		Contract/Supplier Monitoring Data
<b>X</b>	Recent Local Consultations	<b>X</b>	Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
	Complaints		Risk Assessments
	Service User Surveys		Research Findings
<b>X</b>	Census Data	<b>X</b>	East Sussex Demographics
	Previous Equality Impact Assessments		National Reports
	Other organisations Equality Impact Assessments		Any other evidence?

### 3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination. None received to date.

### 3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.

Consultations on individual proposals will be undertaken where appropriate before final decisions are taken on which projects should be taken forward in each area of basic need.

### 3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service? Separate EQIAs will be carried out as part of the consultation for each individual proposal. At this stage the Local Authority believes each proposal will have a positive impact for local children, including those with SEND, as the expansion of existing schools / provision of new schools will allow more families to access a school place in their local area. Extended or new provision will also be compliant with DDA regulations and the Equality Act 2010 for disabled pupils.



## Part 4 – Assessment of impact

### 4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

#### a) How is this protected characteristic reflected in the County/District/Borough?

There are 62,471 children and young people aged 4-16 attending primary, secondary and special schools in East Sussex. Pupil numbers by Key Stage are:

##### Mainstream schools:

Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
5,624	10,979	21,007	14,314	9,683	61,607

##### Special schools:

Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
42	86	231	274	231	864

Source: School Census January 2016

#### b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The proposals will affect children and young people of primary school and secondary school age both in mainstream and special schools:

Number of children in each Basic Need Planning Area<sup>1</sup>:

	Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
Bexhill	419	770	1,421	1,246	905	4,761
Eastbourne	1,107	2,241	3,980	2,903	1,892	12,123
Frant	15	30	56			101
Hailsham	256	500	901	575	364	2,596
Hastings	1,050	1,931	3,924	2,272	1,575	10,752
Newhaven	138	266	497	317	235	1,453
Peacehaven	193	422	760	539	345	2,259
Polegate / Willingdon	149	242	490	579	400	1,860
Seaford	237	473	873	720	468	2,771
Uckfield	159	323	666	817	532	2,497

<sup>1</sup> Includes special schools

Source: School Census January 2016

## Equality Impact Assessment

- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Children and young people of school age in areas of basic need will be more affected by the proposals than children and young people in other areas of the county where there is not predicted to be pressure on school places.

- d) What is the proposal, project or service's impact on different ages/age groups?**

Each proposal will have a positive impact on local school age children and young people and their families as it will enable more children and young people to access a school place in their local area.

The Council is very experienced in construction projects at schools and the health and safety of children is paramount when any building project takes place. Build programmes would be developed to minimise disruption to teaching and learning during this time.

- e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?**

The Local Authority does not believe the proposals will have a negative impact.

- f) Provide details of the mitigation.**

N/A

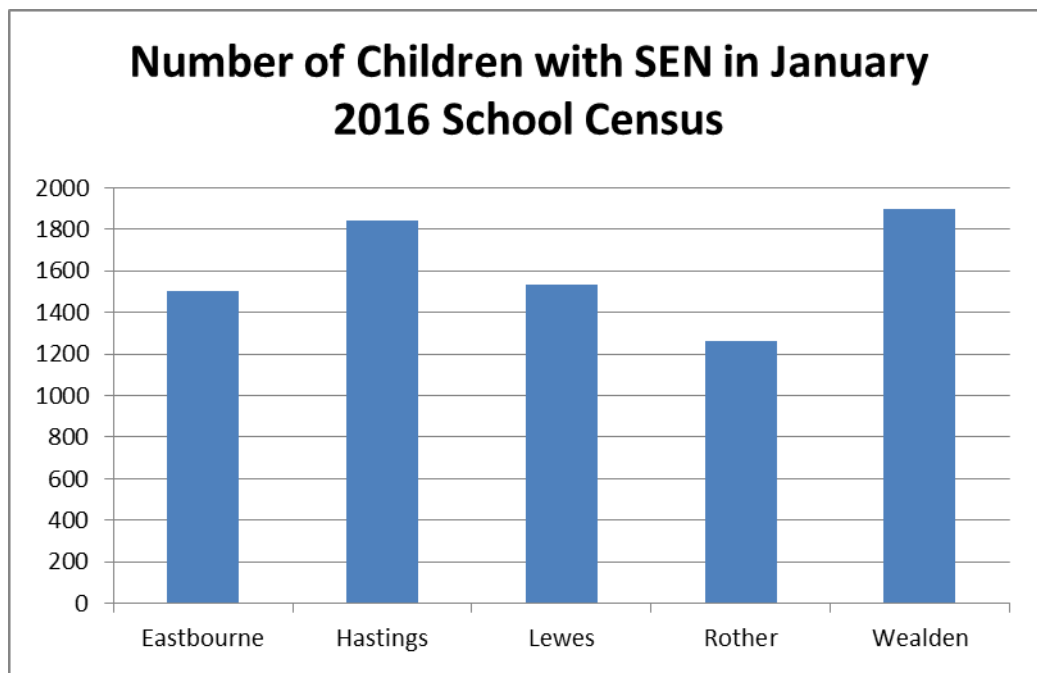
- g) How will any mitigation measures be monitored?**

N/A

## 4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

### a) How is this protected characteristic reflected in the County /District/Borough?

The following chart shows the number of children recorded as having Special Educational Needs (SEN) in the January 2016 school census (children attending East Sussex maintained primary schools and academies). District/ Borough information relates to the pupil's home address as reported in the January 2016 school census.

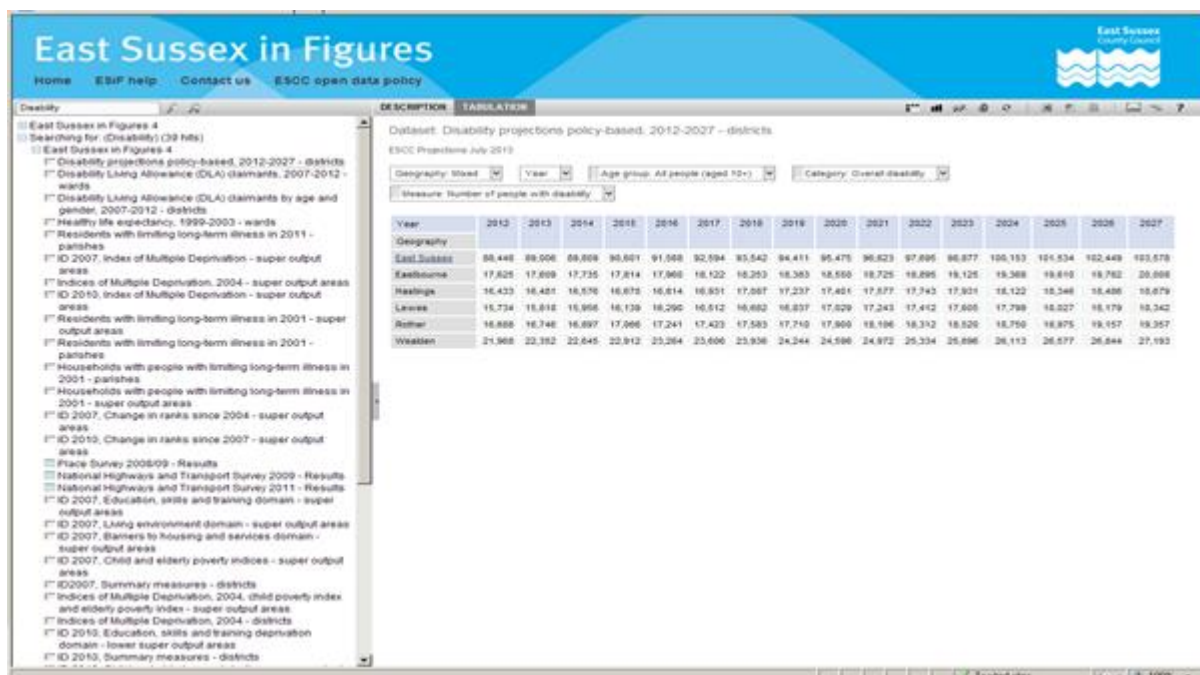


In East Sussex there were 7,988 children recorded as having Special Educational Needs in the January 2016 school census. This is broken down by Borough / District as follows:

Eastbourne	1,516
Hastings	1,749
Lewes	1,599
Rother	1,273
Wealden	1,851

Disability projections published on East Sussex in Figures (ESiF) in July 2013 put the total number of people with a disability in East Sussex at 89,006 for 2013. The figures for each Borough / District are:

Eastbourne	17,609
Hastings	16,481
Lewes	15,818
Rother	16,746
Wealden	22,352



**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

The proposals will affect all children and young people attending schools in areas of basic need including those with SEND at mainstream and special schools:

Number of SEND pupils in each basic Need Planning Area<sup>1</sup>:

	Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
Bexhill	27	59	183	181	152	602
Eastbourne	107	318	533	340	223	1,521
Frant		2	7			9
Hailsham	10	48	114	89	61	322
Hastings	76	214	665	468	324	1,747
Newhaven	12	56	107	37	31	243
Peacehaven	21	58	97	76	68	320
Polegate / Willingdon	12	19	84	36	19	170
Seaford	10	43	135	84	52	324
Uckfield	24	38	112	94	27	295

<sup>1</sup> Includes special schools

Source: Schools Census January 2016

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Children and young people of school age with SEND in areas of basic need will be more affected by the proposals than children and young people with SEND in other areas of the county where there is not predicted to be pressure on school places.

**d) What is the proposal, project or service's impact on people who have a disability?**

Each proposal will have a positive impact on local school age children and young people with SEND and their families as it will enable more children and young people to access a school place in their local area. New special schools will have a positive impact on children from a wider area who will be able to travel to the new provision rather than attend expensive independent provision sometimes out of county.

The Council is very experienced in construction projects at schools and the health and safety of children is paramount when any building project takes place. Build programmes would be developed to minimise disruption to teaching and learning during this time.

Each proposal will have a positive impact as all new and extended provision will be compliant with DDA regulations and the Equality Act 2010 for disabled pupils.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

The Local Authority does not believe the proposals will have a negative impact.

**f) Provide details of any mitigation.**

N/A

**g) How will any mitigation measures be monitored?**

N/A

**4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact.** Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

**a) How is this protected characteristic reflected in the County /District/Borough?**

At the January 2016 census 87.8% of the school age population in East Sussex are of White British Heritage. This is below the figure for the whole of East Sussex which stands at 91.7% of the population (taken from the 2011 census). Where ethnicity is known 12.2% of the school age population in East Sussex are from ethnic minority backgrounds compared to 8.3% for the population as a whole in East Sussex (2011 census).

**Mainstream schools:**

Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
<b>691</b>	<b>1,524</b>	<b>2,687</b>	<b>1,612</b>	<b>1,023</b>	<b>7,537</b>

**Special schools:**

Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
<b>7</b>	<b>16</b>	<b>39</b>	<b>25</b>	<b>25</b>	<b>112</b>

## Equality Impact Assessment

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

The proposals will affect all children and young people attending schools in areas of basic need including those with the protected characteristic:

Number of BME pupils in each Basic Need Planning Area<sup>1</sup>:

	Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
Bexhill	47	101	198	228	150	724
Eastbourne	219	521	786	457	303	2,286
Frant	1	5	8			14
Hailsham	22	39	75	54	39	229
Hastings	174	330	587	266	173	1,530
Newhaven	18	33	51	29	7	138
Peacehaven	23	68	105	48	24	268
Polegate / Willingdon	15	30	48	42	30	165
Seaford	25	51	101	71	36	284
Uckfield	18	37	84	46	33	218

<sup>1</sup> Includes special schools

Source: School Census January 2016

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

We do not believe that people with the protected characteristic will be more affected by the proposal than those in the general population who do not share that protected characteristic as new places will be provided for everyone.

**d) What is the proposal, project or service's impact on those who are from different ethnic backgrounds?**

Each proposal will have a positive impact on local school age children and young people and their families, including those from different ethnic backgrounds, as it will enable more children and young people to access a school place in their local area.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

The Local Authority does not believe the proposals will have a negative impact.

The Council is very experienced in construction projects at schools and the health and safety of children is paramount when any building project takes place. Build programmes would be developed to minimise disruption to teaching and learning during this time.

**f) Provide details of any mitigation.**

N/A

**g) How will any mitigation measures be monitored?**

N/A

**4.4 Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact**

**a) How is this protected characteristic target group reflected in the County/District/Borough?**

Of the 62,471 children and young people aged 4-16 attending primary, secondary and special schools in East Sussex, 30,212 (48.4%) are female and 32,259 (51.6%) are male. This compares to the East Sussex figures of 51.8% for females and 48.2% for males (2011 census).

**Mainstream schools:**

	Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total %
<b>Male</b>	2,878	5,665	10,866	7,299	4,888	50.6 (31,596)
<b>Female</b>	2,727	5,325	10,146	7,009	4,804	48 (30,011)

**Special schools:**

	Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total %
<b>Male</b>	32	62	183	204	182	1.1 (663)
<b>Female</b>	10	24	46	70	51	0.3 (201)

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

The data above shows that girls attending school in East Sussex are under-represented when compared to the figure for the county as a whole, whereas boys attending school in East Sussex are over-represented.

Gender split in each Basic Need Planning Area<sup>1</sup>:

		Foundation Stage:	KS1:	KS2:	KS3:	KS4:	Total
Bexhill	M	206	386	692	649	432	2,365
	F	<b>213</b>	<b>383</b>	<b>730</b>	<b>597</b>	<b>471</b>	<b>2,394</b>
Eastbourne	M	582	1,182	1,992	1,435	992	6,183

## Equality Impact Assessment

	F	<b>521</b>	<b>1,065</b>	<b>1,725</b>	<b>1,471</b>	<b>926</b>	<b>5,708</b>
Frant	M	7	17	21			45
	F	<b>8</b>	<b>13</b>	<b>35</b>			<b>56</b>
Hailsham	M	138	237	458	286	195	1,314
	F	<b>118</b>	<b>263</b>	<b>443</b>	<b>289</b>	<b>169</b>	<b>1,282</b>
Hastings	M	550	979	2,072	1,194	778	5,573
	F	<b>497</b>	<b>954</b>	<b>1,853</b>	<b>1,078</b>	<b>794</b>	<b>5,176</b>
Newhaven	M	76	140	255	171	114	756
	F	<b>62</b>	<b>126</b>	<b>242</b>	<b>146</b>	<b>121</b>	<b>697</b>
Peacehaven	M	97	220	388	283	182	1,170
	F	<b>96</b>	<b>202</b>	<b>372</b>	<b>255</b>	<b>164</b>	<b>1,089</b>
Polegate / Willingdon	M	85	119	273	293	209	979
	F	<b>64</b>	<b>123</b>	<b>217</b>	<b>286</b>	<b>191</b>	<b>881</b>
Seaford	M	115	228	478	370	249	1,440
	F	<b>122</b>	<b>244</b>	<b>396</b>	<b>348</b>	<b>221</b>	<b>1,331</b>
Uckfield	M	79	175	345	431	273	1,303
	F	<b>78</b>	<b>149</b>	<b>322</b>	<b>385</b>	<b>259</b>	<b>1,193</b>

<sup>1</sup> Includes special schools

Source: School Census January 2016

- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The Local Authority does not believe that any one gender will be more affected by the proposals than the other as the vast majority of schools in East Sussex are co-educational. Only two schools (both secondary academies) in the county are single-sex (they share a sixth form), but there are no proposals to enlarge either of these schools.

- d) What is the proposal, project or service's impact on different genders?**

The Local Authority does not believe there will be an impact on different genders as places will be provided for everyone.

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

The Local Authority does not believe the proposals will have a negative impact.

The Council is very experienced in construction projects at schools and the health and safety of children is paramount when any building project takes place. Build programmes would be developed to minimise disruption to teaching and learning during this time.

- f) Provide details of any mitigation.**

N/A

- g) How will any mitigation measures be monitored?**



N/A

**4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.**

- a) How is this protected characteristic target group reflected in the County/District/Borough?**

We do not consider marital status/civil partnership characteristics to be relevant to the proposal.

- b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

N/A

- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

N/A

- d) What is the proposal, project or service's impact on people who are married or same sex couples who have celebrated a civil partnership?**

N/A

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) Provide details of any mitigation.**

N/A

- g) How will any mitigation measures be monitored?**

N/A

**4.6 Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.**

- a) How is this protected characteristic target group reflected in the County/District/Borough?**

We do not consider pregnancy and maternity characteristics to be relevant to the proposal.

- b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

N/A

## Equality Impact Assessment

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

N/A

- d) **What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?**

N/A

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of the mitigation**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

### 4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.

- a) **How is this protected characteristic reflected in the County/District/Borough?**

There is a broad and diverse range of provision across East Sussex for children and young people in East Sussex:

Of the 192 schools in East Sussex on 1 September 2015, 66 are Community, 47 are Voluntary Controlled (VC), 29 are Voluntary Aided (VA) and 50 are academies\*, free schools, foundation schools, studio schools and university technical colleges.

\*Two academies are part of the Diocese of Chichester Academy Trust.

- b) At the January 2016 census 15,373 children and young people aged 4-16 attended VC or VA schools in East Sussex. This equates to almost 25% of the school age population in the county.

- c) **How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Percentage total of pupils attending either a VA or VC school in each of the planning areas:

(\* this includes Church schools which have converted to academy and special schools)

Planning Area	Number and % of VA and VC schools in each planning area	Number and % of pupils attending a VA or VC school in each planning area
Bexhill	4 of 11 (36%)	1,851 of 4,761 (39%)
Eastbourne	6 of 29 (21%)	2,444 of 12,123 (20%)
Frant	1 of 1 (100%)	101 of 101 (100%)
Hailsham	0 of 7 (0%)	0 of 2,596 (0%)
Hastings	6 of 25 (24%)	2,103 of 10,752 (20%)
Newhaven	0 of 6 (0%)	0 of 1,453 (0%)
Peacehaven	0 of 4 (0%)	0 of 2,259 (0%)
Polegate/Willingdon	0 of 3 (0%)	0 of 1,860 (0%)
Seaford	1 of 6 (17%)	200 of 2,771 (7%)
Uckfield	2 of 6 (33%)	327 of 2,497 (13%)

Source: School Census January 2016

- d) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The majority of VA schools are also community schools in that they accept pupils of different faiths or no faith. It is possible that some school expansion proposals which come forward might be for VC or VA schools if that is considered the most appropriate solution for an area and there is sufficient demand for faith places to justify expansion.

- e) What is the proposal, project or service's impact on the people with different religions and beliefs?**

The Local Authority does not believe there will be an impact on people with different religions and beliefs as there will continue to be a diverse range of provision across the county for children and young people.

**What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

The Local Authority does not believe the proposals will have a negative impact.

- f) Provide details of any mitigation.**

N/A

- g) How will any mitigation measures be monitored?**

N/A

#### **4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.**

## Equality Impact Assessment

- a) **How is this protected characteristic reflected in the County/District/Borough?**

We do not consider sexual orientation characteristics to be relevant to the proposal.

- b) **How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

N/A

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

N/A

- d) **What is the proposal, project or service's impact on people with differing sexual orientation?**

N/A

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of the mitigation**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

### **4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.**

- a) **How are these groups/factors reflected in the County/District/ Borough?**

We do not consider other groups/factors to be relevant to the proposal.

Places will be available regardless of background, gender, deprivation etc in line with the Admissions Code.

- b) **How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

N/A

- c) **Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

N/A

- d) **What is the proposal, project or service's impact on the factor or identified group?**

## Equality Impact Assessment

N/A

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

- f) Provide details of the mitigation.

N/A

- g) How will any mitigation measures be monitored?

N/A

### 4.10 Human rights - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

No human rights implications have been identified.

Articles	
A2	Right to life (e.g. pain relief, suicide prevention)
A3	Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)
A4	Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)
A5	Right to liberty and security (financial abuse)
A6 & 7	Rights to a fair trial; and no punishment without law (e.g. staff tribunals)
A8	Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)
A9	Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)
A10	Freedom of expression (whistle-blowing policies)
A11	Freedom of assembly and association (e.g. recognition of trade unions)
A12	Right to marry and found a family (e.g. fertility, pregnancy)
Protocols	
P1.A1	Protection of property (service users property/belongings)
P1.A2	Right to education (e.g. access to learning, accessible information)
P1.A3	Right to free elections (Elected Members)

## Part 5 – Conclusions and recommendations for decision makers

### 5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

Each project will deliver more school places in areas where demand for places currently outstrips provision.

By providing additional places in these areas, more local children will be able to access a place at their local school.

Each project will have a positive impact as all new provision will be compliant with DDA regulations.

### 5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
x	<b>A No major change</b> – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	The proposals will have a positive impact on mainstream and special school children and young people as each project will deliver more school places in areas where demand for places currently outstrips provision as a result of a rising birth rate and/or housing development.
	<b>B Adjust the policy/strategy</b> – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	By providing additional places in these areas, more local children will be able to access a place at their local school.
	<b>C Continue the policy/strategy</b> - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate	All new and extended provision will be compliant with DDA regulations and the Equality Act 2010 for disabled pupils.
	<b>D Stop and remove the policy/strategy</b> – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.	The Local Authority will be able to discharge its statutory duty to ensure a sufficient supply of school places for everyone, regardless of their background, gender, deprivation etc in line with the Admissions Code.

### 5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?



## Equality Impact Assessment

Where appropriate a separate EqIA will be undertaken for each proposal within the programme before a final decision is taken on whether to proceed with a project to provide more places.

### 5.4 When will the amended proposal, proposal, project or service be reviewed?

See 5.3 above

<b>Date completed:</b>	<b>15 December 2016</b>	<b>Signed by (person completing)</b>	<b>Gary Langford</b>
<b>Role of person completing</b>			<b>Place Planning Manager</b>
<b>Date:</b>	<b>15 December 2016</b>	<b>Signed by (Manager)</b>	<b>Jessica Stubbings</b>

Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

☐

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

- 1. Lower the negative impact, and/or
- 2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
- 3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
- 4. **If no actions fill in separate summary sheet.**

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)

6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)

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