

Equality Impact Assessment



Assessment Of:	Asset Management Plan
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other:	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Corporate	Assessment carried out by: T Phillips
Service Area: Assets	Job Role: Assets Manager
Version / Date of Sign Off by Director:	26 January 2024

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The existing Asset Management Plan was adopted in December 2018 and is now beyond its five year lifespan. The term Asset is referring to land and buildings / real estate / property. The new Strategic Asset Plan (SAP) will comprise three parts.

- 1 Policy (5 years)
2. Strategy (3 years)
3. Action plan (1 year)

All three parts fit together to deliver on the Council's wider policy framework and the Council strategy.

The policy document sets out behaviours and approaches to managing the council's real estate (property) holdings and set the foundational context in which decision making will be based. There is a drive to have the constituent parts adopted in sequence and therefore the Policy document will be put before Executive ahead of documents 2 and 3.

It is proposed that an EIA will be undertaken to specific decisions that flow out of the adopted policy to ensure consequences are considered.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community	<input checked="" type="checkbox"/> Teignbridge workforce
---	---	---

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

Yes **No** [please select]

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies.

Understanding the effect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. The Strategic Asset Plan is designed to help deliver the Council / Corporate Strategy therefore nothing should be contrary to its objectives. The scope of the Strategic Asset Plan is wide ranging and, like the Council Strategy, has the potential to impact on every user of the Council's real estate holdings and service users including the actual delivery of those services. The Policy outlines the principles which the Council will take forward as well as a number of more concrete proposals. As this is a high level policy all changes will be subject to scrutiny in their own right. So that while the policy does not have a negative impact in and of itself each individual current and future proposal is likely to require an EIA to measure the impact of the specific changes to be introduced. Where an individual EIA highlights any negative impacts mitigating actions will be identified to address these where practicable, or where not practicable to ensure decisions are made and justified in the context of such identified impacts. In terms of the consultation for the Policy to be taken forward for adoption.

A draft version of the new document will be shared internally with key members of staff to feedback on the proposed content and then shared with the Senior Leadership Team (SLT) for consideration.

The principles of the SAP policy will be clearly set out and will be debated and voted on via Executive.

The scope of the policy, which is designed to give high level principles, is too wide to cover every possible EIA implication. If a downstream decision results in a change to a property then it is suggested that separate EIAs are produced as part of that specific decision making process. Reference to this requirement will be clearly set out within the Policy Document, whilst the subsequent Strategy Document will set out how this will be fully considered on a case-by-case basis.

For example, a decision to dispose of an asset would be assessed at the time for equality implications of the users and stakeholders of that building, should there be any. It could be that certain groups use the building as a meeting point. Other groups may rely on it, or that the building design is particularly suitable for catering to certain protected characteristics. These factors will be taken in to account and suitably scored as part of disposal, acquisition, development and leasing decisions to mitigate the risk of inadvertently creating an owned estate that is not suitable / fit for the needs of the Districts demographic and visitors. A hypothetical scenario could be in making a decision to dispose of one of two operational buildings, the building that meets accessibility standards and facilitates wheelchair users is preferred to be retained than the one that does not meet such standards.

Data will ensure informed decision making and that the District's makeup and needs are appropriately reflected in the specific property level decisions and the "Asset Challenge and Review" process which will be used to assess property suitability and ownership purpose. This process will also include an assessment of Social Value for different property based decisions such that consideration can be had for other non-commercial outcomes.

This will ensure that those who are affected by the decisions made are taken in to account. Consultation of service users will help to better understand the impact of property based decisions.

Reference will be had to the Equality Framework for Local Government (EFLG) 2021 or subsequent alternative version as appropriate. this will help ensure TDC

- Uses its estate to deliver accessible, inclusive and responsive services to customers and residents in their communities including those from under-represented groups.
- Can employ a workforce that reflects the diversity of the area.
- Provides equality of opportunity for all staff.
- Meets the requirements of the Public Sector Equality Duty.

As an example, the Achieving Category, which makes reference in 12.3, to Community Asset Transfer should be explored and whether such transfers can better facilitate equality outcomes by local communities rather than the local authority.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation compared with Teignbridge's economically active citizens for age, disability, ethnicity, gender, religion/belief and sexual orientation.

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
Demographic Analysis for District	Information on residents and indication of protected characteristics that may need to be considered as part of property based decision making
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

This will be considered around specific decisions at the appropriate time so that the right context and circumstances of each can be taken in to account when the detail is known and the types of applicable evidence base can be explored for the specific situation.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Similarly to 2.3 this will be addressed on a case-by-case basis when detail of the specific decision to flow out of the policy is known and any identified relevant groups could be consulted.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

Similarly to 2.3 and 2.4 in order for this engagement to be specific and appropriate it needs to be undertaken at a later stage of post policy decisions, when the effected stakeholders can be identified.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
It is proposed that these considerations would be assessed on a case-by-case basis for specific property based decisions that flow out of the new adopted policy. They are considered too specific to assess at the Policy stage.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Not from the policy document directly but should be assessed for individual property based decisions
Mitigations:	Assessed on specific basis
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>

Potential impacts:	Not from the policy document directly but should be assessed for individual property based decisions. For example a decision that results in loss of public WC facilities or Town Centre car parking or support for active travel groups.
Mitigations:	Assessed on specific basis
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Not from the policy document directly but should be assessed for individual property based decisions. For example a decision that results in the installation of a Changing Places facilities would be a positive, however, a decision that impacted active travel groups could be a negative.
Mitigations:	Assessed on specific basis
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Nothing within the policy should, however, some property based decision could impact on gender such as installation of gender neutral WCs or changing facilities and these would have to be assessed on a case by case basis. The policy is not intended to dictate an approach to these sorts of design considerations.
Mitigations:	Assessed on specific basis
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Nothing within the policy should impact anyone based on their sexual orientation.
Mitigations:	Consideration given on a case by case basis to assess any specific property based decisions but none can be envisaged at this stage.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Nothing within the policy would address / dictate such considerations. Property design and decisions can have a bearing on this area, such as provision of baby changing facilities but is not covered within this policy document. If decisions resulted in the loss of such provision that would have to be considered and assessed on a specific basis.
Mitigations:	Assessed on specific basis. Consultation with property users.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Nothing within the policy would address / dictate such considerations. There could be similar consideration as above in terms of specific WC facilities or if such groups use certain buildings or areas.
Mitigations:	Assessed on specific basis. Consultation with property users.
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Nothing within the policy would have an adverse impact on somebody due to their race.
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	No specific impact but assessments should be made at the time of making property based decisions. For example provision of prayer rooms in offices. Any disposal of a building or area that is used by groups would have to be considered but that would be assessed on a case by case basis.
Mitigations:	Needs assessment. Consultation with property users.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>

Potential impacts:	Not aware of any potential impact to people within this category, however, as with all others above it will be explicitly considered on a case by case basis.
Mitigations:	Assessment on case-by-case basis.

OTHER RELEVANT CHARACTERISTICS

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	It may or may not depending on the circumstances. For example, a decision to use land to deliver Affordable Housing at the financial cost of using it for higher value private housing could have a positive impact. Conversely a decision that brought an end to community groups or charity occupation and provision such as Citizens Advice Bureau could have a negative impact.
Mitigations:	Assess each decision on a case-by-case basis.
Other group(s) <i>Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport</i>	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

As discussed above, nothing specific directly from the Policy itself but benefits could emerge and these would have to be assessed on a case by case basis.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Having reviewed the Policy document within the context of the EIA it is obvious that the specific impacts that might come out of the policy are difficult to predict at this stage. However, what this highlights is the necessity to ensure the policy itself sets the expectation that specific EIAs will be undertaken, where necessary, for actions that emerge in order to enable informed decision making.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Similarly it is difficult at the initial stage to predict what specific positive impacts and opportunities could flow out of the policy document. However, by establishing the principle that each separate decision will be assessed on its own merits once the detail is known will present the best possible chances of positive EIA based actions and decision making to occur.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Insert reference to specific EIAs in to the Policy document prior to adoption	Tom Phillips	5 February 2024
EIAs to be completed for the Strategy and Action Plan stages of the Strategic Asset Plan (SAP).	Tom Phillips	Before end June 2024
Undertake EIAs on specific decisions to flow out of the new SAP	TBC	Ad hoc

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

The wording in the policy document will be evident.
The process will be established such that an EIA will accompany every relevant decision and an assessment will be included as part of the Asset Challenge scoring process.
Impacts of decisions will be recorded on a schedule.

4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?

Open engagement during specific EIAs should achieve this.

Step 5: Review & Sign-Off

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

<p>Reviewed by Service Manager: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Instead was reviewed by:</p> 	<p>Strategic Leadership Team Sign-Off:</p> <p>Neil Blaney, Head of Place and Commercial Services</p>
<p>Date: 26 January 2024</p>	<p>Date: 5 February 2024</p>