

EQUALITY IMPACT ASSESSMENT:

The Statement of Community Involvement

1.0 INTRODUCTION

1.1 What is it?

The assessment of services and policies for impact on equality of opportunity is a statutory duty flowing from the Race Relations (Amendment) Act 2000. The Council has agreed that all assessments for impact will extend to other equality and community groups.

1.2 Purpose

The key purpose of conducting an Equality Impact Assessment (EIA) of the draft Statement of Community Involvement (SCI) is to help identify potential direct and indirect discrimination as well as potential institutional discrimination. On the basis of the EIA conclusions will be drawn, which will then inform recommendations and a subsequent Action Plan.

1.3 Relevance

The SCI is a document which sets out the Council's policy on consulting communities on planning matters. The production of the SCI commenced in April 2005 with the analysis of existing data and early engagement of those community groups the SCI identified as 'hard-to-reach'. Early engagement of the SCI has involved taking those 'hard to reach' groups and individuals and ensuring that we have begun a dialogue with them at this early stage. This has not only helped to create opportunities for these groups and individuals to be involved in the production of the SCI, but also served as an awareness raising exercise of the planning process in general. Early engagement with those groups was undertaken in various forms and has helped to identify issues specific to individual groups.¹

1.4 Early engagement and the analysis of existing data have informed the first draft of the SCI, which went out for consultation during the period of 16th August to 26th September 2005. Results from the first consultation inform this Equality Impact Assessment and the second draft SCI on which communities will be consulted again in early 2006.

1.5 The London Borough of Hounslow has a resident population of approximately 212,000, around 108,000 of which are female and 104,000 are male. 11.5% of residents in Hounslow are aged over 65, while 23.2% are under 18 years of age. The majority are of White British origin. The second largest ethnic group in Hounslow is Asian and Asian British, many of who are Indian. Correspondingly, just over half of the population is Christian, followed by Muslim, Sikh and Hindu as the next largest faith groups in the borough. With over 120 languages spoken in the borough, Hounslow is one of the most culturally diverse boroughs in London.

1.6 The SCI has been assessed as highly relevant to equality as it is applicable to the general duties of the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995. It is also relevant to the Modernising Government White Paper 1999, which sets out the government's commitment to exploit new technology to offer opportunities and choice in the delivery of public services. The statutory requirement to produce an SCI falls within the Planning and Compulsory Purchase

¹ Please see the Early Engagement Report in Attachment 2 for further details.

Act 2004. Guidance on the content and production of the SCI is described in Planning Policy Statement 12: Local Development Frameworks (PPS 12).

- 1.7 The SCI will also be relevant to the general duties of the Equality Bill that is likely to come into effect in 2007.
- 1.8 A number of local strategies are also relevant. These include the Council's Equal Opportunities and Diversity Policy, the Council's Corporate Equality and Community Cohesion Plan 2005-2008, Children's Participation Strategy, Customer Services Strategy, Corporate Communications Strategy, Access Hounslow and the Council's strategy on e-government.² Please see Appendix 6 for information on where further details of all relevant legislation and strategies can be obtained.
- 1.9 As the SCI is applicable to all individuals, groups and sections of the community, it also impacts on the equality categories and their subgroups. These are defined as age groups, ethnic minority groups, disabled groups, faith groups, gender as well as lesbian, gay, bisexual and transgender (LGBT) groups. The SCI identifies all of these as hard-to reach groups and specifically seeks to engage them. The grid below assesses risks of adverse impacts the SCI may have on the individual equality groups.

	High	Medium	Low	None
Age	Yes			
Ethnicity/race	Yes			
Disability	Yes			
Sexual Orientation	Yes			
Gender	Yes			
Faith	Yes			

- 1.10 As an outward facing document with major implications for accessibility to community involvement the SCI may potentially discriminate against some equality groups. Hence, all equality categories have been identified as high-risk categories.
- 1.11 In the following sections the SCI is assessed against the five strategic equality and diversity objectives defined by the Council's Equality of Opportunity and Diversity Policy. The Council's guidance and toolkit for undertaking EIAs sets out the questions to consider in the process.³ The EIA will help to identify any potential discrimination or negative impact. It will also serve as a basis for evaluating the success of the SCI in delivering the five strategic objectives.
- 1.12 Firstly, the SCI will be assessed against four objectives individually. Following this, crosscutting issues, which are important to consider in relation to more than one objective, will be addressed. Assessment against the 5th objective will form an evaluation, including the main conclusions of the assessment and the consultation with stakeholders, priority recommendations as well as subsequent action points.

² Please see Appendix 6 for information on where further details of all relevant legislation and strategies can be obtained.

³ Please see Attachment 1 for questions considered as part of this Equality Impact Assessment.

2.0 OBJECTIVE ONE: PROMOTING COMMUNITY LEADERSHIP AND COMMUNITY COHESION

2.1 The SCI seeks to ensure the engagement of all sections of Hounslow's communities in the planning process. It identifies those groups and individuals who were not previously engaged. The SCI meets the needs of different communities in Hounslow in specifically tailoring consultation methods to groups, while taking account of cultural, language, educational, physical and other barriers to community involvement. Being accessible in different languages and formats, such as large print and Braille, it contributes to promoting equality, diversity and community cohesion in Hounslow. In providing an equal opportunity of involvement and fostering local ownership of plans and policies the SCI improves quality of life in the borough.

2.2 The first initial draft of the SCI has been informed by the evidence base. There has been an examination of existing practices of consultation within the Borough Planning Department for all planning documents and planning applications. It has also involved examining who our communities are and identifying those groups or individuals who have not traditionally been involved in the planning process.

2.3 This was further strengthened by an examination of general practice across the whole Council and the setting up of an SCI Steering Group. This group consists of officers from across the Council who have a contribution to make, based on their own knowledge and expertise, towards the production of the SCI.

2.4 Assessing for Indirect Discrimination

The SCI intends to affect all equality groups equally and positively. It seeks to engage all sections of the community by providing equal access to community involvement. It does not exclude or target a specific category, but proposes consultation with relevant groups and individuals as appropriate. While the SCI seeks continual, all-inclusive engagement and does not directly discriminate against any group, it may possibly discriminate indirectly against individuals or community groups.

2.5 The SCI may not be accessed equally by all equality groups, which may result in differential impact and benefit from involvement.

3.0 OBJECTIVE TWO: IMPROVING COMMUNICATIONS AND PROMOTING CONSULTATION AND INVOLVEMENT

3.1 The Council has a statutory duty to consult as required by the Planning and Compulsory Purchase Act 2004. Setting out the Council's policy on consultation on the planning process, the Statement of Community Involvement improves communication and promotes consultation and involvement by its very nature. It enables communities to know how, when and at what stage they can get involved in the planning process. In seeking to involve those previously not engaged the SCI promotes equal access to information and consultation.

3.2 All relevant information will be available in a variety of formats, including large print, Braille, on the LBH website, at the Civic Centre and in local papers. For those with a first language other than English the Council's translation unit offers translations on all or some aspects of SCI. Information about the SCI has also been available in the form of mail drops, press releases, posters, leaflets etc. There is also the opportunity of information being delivered in British Sign Language to aid the deaf or those hard of hearing. Promoting and providing a variety of communication channels and

opportunities to access information, the SCI will conform to the Customer Service Strategy, Access Hounslow, the Corporate Communications Strategy and the Council's strategy on e-government. Progress on e-government will provide new ways to contact, communicate and get involved in the planning process.

- 3.3 The SCI requires feedback to be provided to all comments received. In relation to comments received regarding emerging planning policies feedback will be provided on an individual basis, detailing how the comments have been incorporated into the document or the reasons why the comments are not accepted by the Council. In relation to comments received on planning applications, those relevant will be included within the officer's report and taken into account in reaching a conclusion.
- 3.4 The SCI also communicates information on additional means of assistance for those involved or seeking to get involved in the planning process. It advises on the use of relevant local guidance such as Residential Extension Guidelines and the Guide to Permitted Development Rights to help inform and guide those applying for planning permission. Both guidance documents are in pictorial format to enable easy access by all sections of the community. The SCI also provides details of independent planning advice from Planning Aid for London, who enables sections of the community less well served by the planning system to engage.
- 3.5 In promoting a planning system that is transparent and accountable to local communities the SCI fosters partnership between the Council and communities. Increased and improved consultation and feedback will improve the dialogue and achieve local ownership of plans and policies.

4.0 OBJECTIVE THREE: PROMOTING EQUALITY IN SERVICE DELIVERY

- 4.1 All sections of Hounslow's communities can engage in the planning process. In the past those engaging have typically included developers, landowners and those who felt adversely affected by a development. The SCI seeks to build on existing consultation practice and broaden the scope of involvement. The SCI proposes community involvement as part of a continual process, which is increased, improved and also engages those, who previously had no voice in the planning process. In doing so, it helps to make the planning service more accountable, transparent and accessible to communities.
- 4.2 The SCI's impact on equality in service delivery can only be appropriately assessed once the policy is implemented. It is therefore vital to closely monitor any impact on service users.
- 4.3 Those who access planning services may be broadly divided into two categories: Proactive service users and reactive service users. Proactive service users may use the planning service by initiating contact as for instance in an application for planning permission. Reactive service users may use the planning service in reaction to being affected by the planning process. As a result the Borough Planning Department acknowledges that there may be different needs, which may require different methods of involvement.
- 4.4 To achieve continuous and all-inclusive community involvement the SCI seeks to engage those who previously had no voice in the planning process. Therefore, there was a need to identify those who previously did not engage as part of the early scoping work. The SCI identifies these groups and individuals as **hard to reach** on

the basis of social, economic, financial or other isolation. They include groups within the equality categories of age, ethnicity, disability, sexual orientation gender and faith. Additionally, the SCI identifies a number of groups as hard to reach, which are not captured by the equality categories. These include homeless persons, travelling show people, visitors, small traders businesses, new residents and the apathetic. For the purpose of this document only groups within the six equality categories will be considered.

- 4.5** Each group have specific barriers to involvement, which in turn may result in specific needs to be taken account of when consulting these groups. It is not entirely clear at this stage if the needs specific to each hard-to-reach group need to be catered for in the SCI.
- 4.6** The SCI provides for easy access to community involvement in the planning process for disabled persons by proposing a number methods and forums. All consultation is held in accessible locations and buildings. Accessibility to the Civic Centre is also currently being improved within the context of Access Hounslow. The SCI and relevant information are available on LBH website and in large font or Braille for those with visual impairments. Additionally, the Council currently trains staff in British sign language to assist the deaf or those hard of hearing. Disabled persons may also access the planning service and relevant information via avenues, which do not require physical mobility, such as phone, fax, e-mail, and verbal explanations of information as well as tape versions on request. Avenues to engage in the planning process are further being improved through the continual development of e-government.
- 4.7** The SCI may need to cater for religious needs. It identifies faith groups as hard-to-reach groups and includes places of worship as specific forum to engage faith groups. Yet, it needs to be established if there is a need for the SCI to cater for specific religious needs. This could be achieved by further consultation with faith groups, which addresses this question.
- 4.8** The SCI may also need to cater for sexual orientation. A sexual orientation group has been approached, but did not respond.⁴ At this stage it is not entirely clear if the SCI needs to cater for the needs of this category. It needs to be established what the needs specific to this group are and if they need to be catered for. Therefore, there is a need to further engage with homosexual, bisexual and transsexual persons and address these questions.
- 4.9** Other groups representative of this equality category have been suggested as potential consultees during internal consultation exercises. These include Stonewall and Men's Gay Project.
- 4.10** The SCI caters for language needs as it seeks to engage all sections of a community, which is ethnically and linguistically very diverse. It recognises language as potential barrier to involvement and offers details of translation services, which include all major languages spoken in the borough.
- 4.11** The SCI also caters for age specific needs. It recognises age as a potential barrier to involvement and proposes specifically tailored methods that enable access to involvement for these groups. These include involvement of schools and the Youth Council, web-based consultation and focus groups when engaging young people.

⁴ Please see table 3 in Appendix 3 for further details.

Consultation methods for the elderly include the use of accessible buildings, local community facilities for elderly persons and residential care homes. There is also the possibility of the Planning Policy Team going out to venues suitable for specific age groups. Progress on e-government will provide further ways to access to community involvement.

- 4.12** To maximise engagement and accessibility to all sections of the community all consultation exercises will be held in accessible buildings and locations, which are served by good public transport links. The SCI also provides for a number of avenues to access this service, which do not require physical mobility, such as LBH website, e-mail, phone and fax.
- 4.13** Following from the above, the SCI is sensitive to the needs and cultures of all hard-to-reach groups. The SCI tailors consultation methods in response to potential barriers to involvement specific to each group. While consultation with all equality groups has supported this, the specific needs of some equality categories need to be further established.⁵
- 4.14** There is no restrictive legislation at this stage, which may lead to a negative impact on any equality category or subgroup. However, the Borough Planning Department is restricted to a six – week consultation period as required by Planning Policy Statement 12: Local Development Frameworks. This may not be sufficient for some groups, who may prefer longer timeframes in order to respond.
- 4.15** The SCI uses plain and simple language in order to reach out and engage all sections of the community. A duty officer is available from Monday to Friday in the afternoon at the Civic Centre to help answer any questions that may be raised.

5.0 OBJECTIVE FOUR: PROMOTING EQUALITY OF OPPORTUNITY IN EMPLOYMENT AND TRAINING

- 5.1** Equal opportunities and diversity training is a priority training need for all those implementing the SCI and providing a planning service. This will include the Planning Policy Team, Development Control and other officers as appropriate. There is a need for professional standards to be maintained in line with the Council's Equal Opportunities and Diversity policy.

6.0 CROSSCUTTING ISSUES

When assessing for impact on equality and diversity there are a number of questions to consider which cut across two or more of the strategic objectives. These are potential contributions to inequality and consultation with groups within the equality categories.

6.1 Contributions to inequality and negative impact

Any potential contributions to inequality need to be considered when assessing the SCI against Objective One and Objective Three. Some aspects of the SCI may contribute to inequality.

- 6.3** The SCI may not be accessed equally by all equality groups. This may result in differential impact and benefit from involvement, which in turn may lead to perceptions of preferential treatment.

⁵ Please table 2 for details of information to be established.

- 6.4** Any negative impact or contribution to inequality can be effectively assessed once the SCI is implemented.
- 6.5 Consultation**
As part of the EIA consultation with groups and individuals within all equality categories has been undertaken. Results should be taken into account when assessing the SCI against all five objectives. Initial views were based on the results of early engagement with all equality groups, existing data from the 2001 census, relevant strategies and legislation, national guidance, the Community Plan and area profiles.
- 6.6** Initial views from early engagement and the evidence base were verified to some extent through consultation on the draft SCI. Those consulted included groups and subgroups within all equality categories.⁶
- 6.7** All groups have been given sufficient time to consult amongst themselves and their individual member organisations. The Borough Planning Department is legally restricted to a six-week consultation period, but has applied some flexibility.
- 6.8** A total of 10 groups and 18 individuals within the equality categories have made representations.⁷ It should be noted that some groups and individuals represent more than one equality category.

Table 1

Category	Groups	Individuals
Age	3	7
Ethnicity	3	0
Disability	1	0
Faith	2	0
Sexual Orientation	0	0
Gender	1	11

- 6.9 Limitations to first consultation**
A number of limitations to the first consultation can be identified. Lessons from the first consultation will be taken into account and applied to improve future consultation exercises.
- 6.10** The first consultation has verified some of the initial views and established the specific needs and views of some groups. But unsuccessful or insufficient consultation with other groups has meant not all equality specific needs could be established. These include needs specific to faith, sexual orientation and gender.

⁶ Please see Appendix 1 for detailed list of all groups and individuals consulted within the equality categories.

⁷ Please see table 3 in Appendix 3 for further details on groups and individuals engaged, how these groups have been consulted, key points made and action to be taken as result.

Appendix 6 and provides information on where meeting minutes from consultation exercises with groups and the BMG Research Report, September 2005 for details of the Residents Panel survey results, can be obtained.

See Attachment 3 for the report on all representations made.

Appendix 4 lists of umbrella group member organisations.

- 6.11** Not all groups, who have been directly approached, have been successfully engaged. As a result there has not been the opportunity to establish and verify their specific needs and any perceptions of inequality and differential impact. These include
- OutWest
 - Disability Network
 - Hounslow Primary Care Trust
 - Hounslow Asian and African Youth Association (HAAYA)
 - Ethnic Minority Consultative Group (EMCG)
 - Hounslow Refugee Forum
 - Age Concern
 - All individual members of Hounslow Friends of Faith
- 6.12** As there is no legal requirement to monitor sexual orientation, the Council has not yet reached an agreement on monitoring practice in relation to this equality category. As a result, the sexual orientation of consultees could not be monitored during the first consultation period. Therefore, responses from members of the gay, lesbian, bisexual and transsexual community may have been received, but could not be identified.
- 6.13** Disability and faith were not included in the monitoring of respondent profile in the questionnaires used. 57 out of a total of 93 responses have been received in the form of questionnaires. As a result responses from faith groups and disabled persons may have been received but could not be identified. The Planning Policy Team accepts full responsibility and will ensure that at the next stage disability and faith of respondents will be more effectively monitored.
- 6.14** Many groups and individuals represent more than one equality category. The Residents Panel for instance has been considered as representative of several equality categories as its make up is reflective of the borough's population.
- 6.15** For some equality groups there has been only one point of contact. The only point of contact for the gay, lesbian, bisexual and transsexual community was OutWest. Equally, the Hounslow Refugee Forum has been the only point of contact for representation of the refugee community. Though only a subgroup within the ethnicity category, representations from this group are vital in understanding the specific needs of this equality category. Within the context of consultation exercises further groups within both equality categories have been suggested and should be consulted at the next stage.
- 6.17** There are some groups, who have been directly approached, but have not responded. If no response was received, the relevant group was not contacted again and considered as not successfully engaged. Groups, who have not responded, should be re-consulted in a direct and pro-active approach at the next stage.
- 6.18** Gender groups have not been directly approached, but indirectly through umbrella groups and general publicity advertisements. This may have been due to an underlying assumption that respondents are inevitably of specific gender. As a result, comments from individuals have been considered as representative of the gender category.
- 6.19** Consultation methods have involved an interactive questionnaire on the Hounslow website. As this was not advertised sufficiently, only five responses have been

received through this method. The efficient use of resources should be ensured with regard to all consultation methods at the next stage.

6.20 What further data is needed?

The first consultation has not generated some of the data needed to effectively inform the SCI. Any vital information not generated through the first consultation period needs to be specifically addressed at the next stage. Table 2 below specifies further data needed specific to each equality category.

Table 2

Equality Category	Further information needed
Age	<ul style="list-style-type: none"> • Needs specific to older persons • Perceptions of inequality or negative impact on older persons • More representation from additional groups
Disability	<ul style="list-style-type: none"> • More representation from additional groups • Perceptions of inequality or negative impact on disabled persons
Ethnicity	<ul style="list-style-type: none"> • More representation from additional groups • Perceptions of inequality or negative impact on BME groups and individuals
Gender	<ul style="list-style-type: none"> • Representation from gender groups • Needs specific to male and female persons • If the SCI needs to cater for specific needs • Perceptions of inequality or negative impact on men and women
Sexual Orientation	<ul style="list-style-type: none"> • Needs specific to LGBT community • If SCI needs to cater for specific needs • Perception of inequality or negative impact • Representation from LGTB groups
Faith	<ul style="list-style-type: none"> • Needs specific to faith community • If SCI needs to cater for specific needs • Perception of inequality or negative impact • More representation from additional groups

6.21 Limitations of resources

Consultation on the SCI has been managed and delivered by one Principal Planning Officer and two Planning Officers, who form the SCI Team within the Strategic Planning Policy Team, Borough Planning Department. Other members of the Strategic Planning Policy Team and various internal departments have supported the SCI Team.

6.22 The SCI team will also provide support on consultation to officers, who lead on the individual development plan documents. Implementation of SCI with regards to planning applications will be additionally aided by twenty-four Development Control Officers and nine Technical Officers.

6.23 The cost of consultation to implement the SCI will be met through existing budgets. A budget has been established for progressing the LDF in terms of consultation cost.

6.24 The SCI contributes to efficiency in a number of ways. It reduces costs by ensuring draft documents are produced in simple format and style and only final versions are printed in more costly formats. Printed copies of the draft SCI have been limited to 380. The Council's website has enabled communities to access the SCI and all relevant information online and reduced the necessity for printed material. The SCI also proposes consultation, which is fit for purpose and of appropriate scale and type in relation to the type of development or aims of the relevant development plan document. The SCI uses and builds on existing consultation methods, which are already in place.

7.0 OBJECTIVE 5: EVALUATING THE SUCCESS OF THE POLICY IN PROMOTING EQUAL OPPORTUNITIES

7.1 EIA conclusions

There are a number of conclusions to be drawn from the assessment above.

- 1) The SCI upholds and promotes all equality and diversity objectives. It promotes community leadership and cohesion, equality in service provision, equal opportunity in employment and training, consultation and community involvement as well as improvements in communication.
- 2) The SCI does not unlawfully discriminate. All aspects of the SCI support and conform with the legislative requirements of the Race Relations (Amendment) Act 2000, the Disability Discrimination Act 1995 and Planning Policy Statement 12: Local Development Frameworks. The SCI fulfills all general duties of relevant national legislation.
- 3) The SCI affects all equality categories proportionally. At this stage no institutionalized, direct discrimination or negative impact on any equality category can be identified. But impact can only be effectively assessed once the SCI is implemented.
- 4) While the SCI does not directly discriminate, there is potential for the SCI to indirectly discriminate against individuals or community groups. This is largely due to differential access, which may in turn lead to differential impact and benefit.
- 5) It is vital for the SCI to be mindful of accessibility for all equality groups. The SCI and relevant information needs to be available in a number of formats, which respond to the specific needs of individuals and groups that make up Hounslow's diverse community.

7.2 Consultation conclusions

Consultation with the equality groups has highlighted a number of issues.

- 1) Comments representative of the equality categories ethnicity and age largely suggested additional groups to be consulted and additional consultation methods to be used. Suggestions of additional consultation methods to be used give an indication of needs specific to the equality categories of age and ethnicity.⁸

⁸ Table 3 in Appendix 3 sets out details of key points made.

- 2) Comments representative of faith, gender and disability only suggested additional groups and individuals to be consulted. There was no representation from sexual orientation groups and individuals. Hence, needs specific to these categories have not been sufficiently established.
- 3) At this stage none of the groups and individuals within the equality categories could comment on any perceptions of inequality or negative impact.
- 4) The first consultation period has not generated some of the information needed to effectively inform the SCI on issues specific to each equality category. The SCI needs to be further informed by equality groups, which have been unsuccessfully or insufficiently engaged at this stage. These include OutWest, EMCG, Age Concern, the Disability Network, Hounslow PCT, HAAYA and the Refugee Forum. The SCI also needs to be further informed by additional groups, which have not been consulted yet, but would improve representation of the equality categories.

7.3 Recommendations

Following from the conclusions of the impact assessment a number of recommendations are made.

- 1) Indicators of access to, impact and benefit of involvement should be closely monitored to highlight any contribution to inequality and indirect discrimination and ensure all groups are appropriately engaged.
- 2) Those groups that have not been successfully engaged should be further engaged to establish and verify their specific needs and any perceptions of inequality and differential impact.
- 3) It should be established, if the SCI needs to cater for the specific needs of gender groups, faith groups and sexual orientation groups. This should be achieved with further consultation specifically addressing these questions.
- 4) Those groups consulted, which have not responded should be consulted again more pro-actively where possible. Previous methods of consultation specific to these groups should be reviewed for effectiveness.
- 5) Comments representative of the equality category of gender should be established by specifically consulting gender groups, rather than assuming that consultees are inevitably of specific gender.
- 6) Liaison with the Equality and Diversity Team should be established in identifying contacts for equality groups as well as reviewing engagement methods.
- 7) No response to consultation letters, questionnaires, phone calls or emails should not be interpreted as 'not engaged', but as a trigger for reviewing engagement methods used.

7.4 ACTION PLAN

In response to the above recommendations a number of Action Points are suggested, which will set out the actions to be taken within a short-term, medium term and long term framework.

7.5 Short term Action Points

Short-term action points will set out actions to be taken immediately and up to the second consultation period.

- Continue to monitor consultees in relation to age, ethnicity and gender. Ensure that disability is included and effectively monitored at second stage. This can be achieved by including a question specifically addressing disability, age, gender and ethnicity in all consultation questionnaires.
- Review methods used for engagement that have been unsuccessful or insufficient during first consultation, for effectiveness. Identify weaknesses and improve methods on basis of the review.
- Where consultees do not respond, they should be engaged again with revised methods. Alternatively, further points of contacts should be approached.
- It should be ensured that there is always more than one point of contact for each equality category. These can be established through liaison with the Equality and Diversity Team prior to consultation.
- Consult those groups that have not been successfully engaged where possible, using revised methods and alternative points of contact.
- Establish further data needed⁹ in relation to all equality categories at the next stage as far as practicable. This can be achieved by consulting equality groups at the next stage, engaging additional groups and including questions relating to specific needs in consultation questionnaires or exercises.
- Consult sexual orientation groups on their specific needs. This can be achieved by addressing this question in consultation material used.
- Consult faith groups on their specific needs. This can be achieved by addressing this question in consultation material used
- Consult all equality groups identified by consultees during the first consultation as relevant.¹⁰
- Consultation methods and forums should be publicized sufficiently to ensure efficient use of resources. This can be achieved through the use of LBH website, local press, hm magazine and other newsletters leaflets, mail drops, etc.
- To reach out to all members, the Disability Network newsletter should be used in consultation or awareness raising exercises with the Disability Network.

7.6 Medium-term Action Points

Medium-term Action Points set out actions to be taken during the period from the end of the second consultation until adoption.

⁹ as set out in table 2

¹⁰ Please see Appendix 5 for detailed list of groups identified by consultees.

- Continue to monitor consultees in relation to their equality category. This can be achieved by including questions in relation to gender, disability, faith, age and ethnicity into all consultation questionnaires. In case of consultation meetings and focus groups, all equality data should be accurately recorded.
- Monitor all consultation on planning documents and applications in relation to the SCI. A standard monitoring sheet should be developed for this purpose. Similarly, all planning documents and committee reports will have to do a statement of compliance with the SCI.
- Monitor the impact of six-week consultation restriction on consultees. This could be achieved by specifically addressing this question during consultation exercises to highlight any impact caused by time restrictions during consultation.
- Equality and diversity training for all those implementing the SCI, including the Planning Policy Team and Development Control, should be arranged and undertaken. This can be achieved internally by taking part in the Council's corporate equality and diversity training.

7.7 Long-term Action Points

Long-term Action Points set out actions to be taken during the period from adoption through out the lifespan of the SCI.

- The SCI proposes a yearly assessment of itself through the Annual Monitoring Reports, which assesses effectiveness of policies. Additionally, any change or review of relevant equality legislation may trigger a review of the SCI.
- Monitor national legislation for any restrictions to involvement in order to highlight any impact on community groups and individuals. This can be achieved by routinely checking all new legislation for restrictions to involvement and subsequent impact on equality groups.
- Once a corporate agreement on monitoring sexual orientation has been reached, an optional question specifically addressing sexual orientation should be included in consultation questionnaires.
- Consult all groups and individuals within the equality categories on any perception of inequality and negative impact once the SCI is implemented. This can be achieved by including a question addressing negative impact in consultation exercises and questionnaires.
- Monitor the impact of the SCI on equality in service delivery once the SCI is implemented. This can be achieved by monitoring impact on service users as part of questionnaires or consultation exercises.

APPENDIX 1: CONSULTEES WITHIN THE EQUALITY CATEGORIES

- Hounslow Youth Council
- Hounslow Asian and African Youth Association
- Age Concern
- Disability Community Forum
- Disability Network
- Hounslow Primary Care Trust
- Hounslow Racial Equality Council
- Ethnic Minority Consultative Group
- Hounslow Refugee Forum
- Travellers Law Reform
- Individual members of Friends of Faith, including
 - Ahmadiyya Muslim Association
 - Gurdwara Sri Guru Singh Sabha
 - Hounslow Jamia Mosque and Islamic Centre
 - The London Buddhist Vihara
 - Bahai
 - Quakers
 - Jewish Group
 - Gurdwara Guru Nanak Nishkam Sewak Jatha
 - Westminster Interfaith - Catholic Church diocese of Westminster
- Maswell Park Church
- Brentford and Isleworth Quaker Meeting
- Maswell Park Church Apricot Over 55s Group
- OutWest
- Woman for Housing
- Residents Panel
- Individuals

Wider consultees within the equality categories include groups, which operate on a regional or national level.

- Gypsy Council
- Women Counselling Service
- Church of England
- Church Commissioners
- Commission for Racial Equality
- Disability Rights Commission
- Disabled Persons Transport Advisory Committee
- West London Disability Partnership
- Help the Aged
- Equal Opportunities Commission
- Women's National Commission

APPENDIX 2: CONSULTATION WITH EQUALITY GROUPS

Consultation took place with all Area Monitoring Meetings, the Residents Panel, community groups, stakeholders and individuals in a variety of different formats.

The Area Monitoring Committees include Central Hounslow, Heston and Cranford, Chiswick, West Area and Isleworth and Brentford Area Committees and are representative of the five areas in the borough. Comments received are considered not to be representative of the equality categories.

The Residents panel constitutes a pool of 2000 residents, who have agreed to take part in consultation. The panel is demographically representative of the borough and reflects Hounslow's diverse population based on the 20001 Census in terms of gender, age, and ethnicity. As a result the Residents Panel is representative of these 3 equality categories. All panel members were sent questionnaires, of which 1156 were completed and returned.

Consultation with equality groups included the Hounslow Racial Equality Council, Disability Community Forum and Youth Council and took place in form of a short presentation and subsequent debate. All consultation exercises with equality groups formed part of a group meeting to ensure accessibility for all equality groups.

Debate was centred on the issues of appropriate consultees, consultation methods and forums tailored to groups, the provision of feedback and the levels of community involvement in planning applications.

Youth-friendly questionnaires were used to specifically address the needs of young people and a Braille copy of the SCI was used to specifically meet the needs of disabled persons.

All other groups were consulted by sending out the SCI, relevant supporting information and a questionnaire to their respective representatives.

There are also groups and individual, which have been indirectly approached through general advertising, publicity or through umbrella groups, who cascade information down to member groups.

APPENDIX 3: TABLE 3

This table demonstrates how equality groups have been approached and consulted, any key points made and actions to be taken as a result.

Categories / Groups	How approached?	How consulted? / Why not?	Key points made	Action / Justification
Age				
Youth Council	Approached via Telephone and Email. Arrangements made for consultation in liaison with Youth Service.	Short presentation and subsequent discussion at Youth Council Meeting on 4 th October 2005. Included the use of youth-friendly questionnaires.	<ul style="list-style-type: none"> Youth are excluded from the planning process. Preferred methods included the use of libraries, leisure centres youth clubs, face-to-face consultation, visit to schools. Documents should be produced in young peoples' versions. 	<ul style="list-style-type: none"> Efforts are being made to approach young people through their preferred methods, such as schools, libraries, and Internet and youth groups. Further actions to be agreed.
Hounslow Asian and African Youth Association (HAAYA)	Approached on several occasions via phone.	Several arrangements for consultation exercise, involving presentation and discussion at Friday Youth Club, made. But repeatedly cancelled due to HAAYA staffing issues.	None	None
Age Concern	Approached by letter.	Draft SCI, leaflet and questionnaire sent in the post.	None	None

Maswell Park Church Apricot Over 55s Group	General advertising and publicity	Respondent obtained and completed SCI questionnaire.	<ul style="list-style-type: none"> • Suggestions include the use of electronic screens in public places. • Preferred methods included print on paper information, the use of hm magazine and a wider distribution of notification on planning applications. • List of community groups are inaccurate and need to be more explicit. • A 6 week consultation period may well be too short. • Feedback to comments relating to planning applications is paramount. • Outcomes should be fed back in numerical form, including the outcome of the consultation of the first draft SCI. 	<ul style="list-style-type: none"> • Lists of groups will be further clarified. • PPT will endeavour to ensure that a number of mechanisms are used to engage communities, including the use of print copies. • The Council is obliged to adhere to consultation time limits of 6 weeks as set out in PPS12. • The use of electronic screens is still being considered. • The process of feedback on comments relating to planning applications will be further clarified. • Formal consultation feedback will be largely through the committee process. Numerical feedback is contained in reports accompanying decisions, letters to individuals and groups. • Respondents will be notified if and how their comments have been taken forward. Further details are available in the Executive Committee Report.
Residents Panel (representative of older persons only)	Approached by letter.	Questionnaires were sent out in the post.	<ul style="list-style-type: none"> • Preferred methods include letters, the use of local press, hm magazine and e-mail 	Noted

Individuals	General advertising and publicity.	Respondent obtained and completed SCI questionnaire.	Please see report on all representations made.	
Disability				
Disability Community Forum (DCF)	Approached via e-mail / phone in liaison with DCF Committee Clark Joan Conlon.	Presentation and debate at Disability Community Forum on 16 th May 2005. Included use of Braille version of Executive Summary.	<ul style="list-style-type: none"> • Consultation should take place early to allow for changes to be included. • Preferred methods include computer-generated drawings instead of plans for easier understanding. • Suggestions included to set up a group specifically to look at drawings and improvements of signage and street design to aid those suffering from dementia. 	Actions not yet agreed.
Disability Network	Approached by letter.	Letter, questionnaire and draft SCI sent, but no response received.	None	None
Hounslow Primary Care Trust	Approached by letter.	Letter, questionnaire and draft SCI sent, but no response received.	None	None
Individuals	General advertising and publicity.		Responses from disabled persons may have been received, but could not be monitored.	None

Ethnicity / Race				
Hounslow Racial Equality Council (HREC)	Approached through phone, email and in a personal meeting in liaison with Equality and Diversity Officer Savi Bhamra.	Presentation and debate at HREC Consultative meeting on 8 th September 2005.	<ul style="list-style-type: none"> • There should be more information on planning in the public domain and be made available particularly to BME groups. • Preferred methods include verbal, face-to-face approaches instead of internet and email. • Suggestions included to make use of the HREC mailing list and voluntary sector list to reach out to BME groups. 	<ul style="list-style-type: none"> • Actions not yet agreed.
Hounslow African and Caribbean Association (HACA)	Approached via phone, letter and through umbrella group HREC.	Draft SCI, leaflet and questionnaire sent in the post, but no response received. Also presentation and debate at HREC meeting.	<p>Comments from HACA representative at HREC meeting</p> <ul style="list-style-type: none"> • There should be more information on planning in the public domain and be made available particularly to BME groups. • Preferred methods include verbal, face-to-face approaches instead of internet and email. 	Noted
Hounslow Refugee Forum	Approached via phone, letter and through umbrella group HREC.	Draft SCI, leaflet and questionnaire sent in the post, but no response received. Also presentation and debate at HREC meeting.	None	None

Traveller Law Reform	Approached by letter.	Draft SCI, leaflet and questionnaires sent out in the post.	<ul style="list-style-type: none"> • Guidance on gypsies and travellers should be taken into account • Visits to traveller sites should be made • Consultation with a number of additional traveller groups are suggested 	Noted
Hounslow Asian and African Youth Association (HAAYA)	Approached on several occasions via phone.	Several arrangements for consultation exercise, involving presentation and discussion at Friday Youth Club, made. But repeatedly cancelled due to HAAYA staffing issues.	None	None
Ethnic Minority Consultative Group (EMCG)	Approached via e-mail and phone	Presentation and debate agreed but postponed to second consultation as no suitable time could be arranged.	None	None
Residents Panel	Approached by letter.	Questionnaire was sent out in the post.	Preferred methods include letters, the use of local press, hm magazine and email.	Noted
Individuals	Approached through general advertising and publicity.	Respondent obtained and completed SCI questionnaire.	Please see report on all representations made.	

Faith				
Ahmadiyya Muslim Association	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Gurdwara Sri Guru Singh Sabha	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Hounslow Jamia Mosque and Islamic Centre	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
The London Buddhist Vihara	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Bahai	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Quakers	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Jewish group	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None

Gurdwara Guru Nanak Nishkam Sewak Jatha	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Westminster Interfaith - Catholic Church diocese of Westminster	Approached by letter as advised by umbrella group Friends of Faith.	Draft SCI, leaflet and questionnaire sent in the post.	None	None
Maswell Park Church	General advertising and publicity.	Respondent obtained and completed SCI questionnaire.	<ul style="list-style-type: none"> Suggestions included to consult churches or groups of churches individually 	Noted
Brentford and Isleworth Quaker Meeting	General advertising and publicity.	Respondent obtained and completed SCI questionnaire.	<ul style="list-style-type: none"> Suggestions included more friendly approaches in letters to consultees and the use of advice by the Plain English Campaign. Methods to reach out to women should also be suitable for those without children. Women are over-represented rather than hard-to-reach groups. 	<ul style="list-style-type: none"> Comments relating to style of how we ask for and deliver information will be taken on board The use of the Plain English Campaign is still being considered as it would be very costly
Individuals	General advertising and publicity.		Responses from faith persons may have been received, but have not been monitored.	
Gender				
Woman for Housing	General advertising and publicity.	Respondent obtained and completed SCI questionnaire.	<ul style="list-style-type: none"> Agrees with the SCI on all aspects. 	Noted

Individual female residents	General advertising and publicity.	Respondent obtained and completed SCI questionnaire	Please see report on all representations made	
Residents Panel	Approached by letter.	Questionnaire sent in the post	<ul style="list-style-type: none"> Preferred methods include letters, the use of local press, HM and e-mail 	Noted
Sexual orientation				
OutWest	Approached by letter.	Draft SCI, leaflet, questionnaire sent in the post, but response received.	None	None
LGTB Individuals	General publicity and advertising.		Responses from LGBT persons may have been received, but could not be monitored.	None

APPENDIX 4: UMBRELLA GROUP MEMBER ORGANISATIONS

Listed below are the member organizations of umbrella groups consulted.

Local Strategic Partnership

The Local Strategic Partnership is made up of representatives from the private, public and voluntary sector, including:

- The Hounslow Racial Equality Council
- The Hounslow Voluntary Sector Forum
- Hounslow PCT
- Metropolitan Police
- West London Business
- West London Learning and Skills Council
- Hounslow Fire and Emergency Planning Authority
- LBH Chief Executive
- Corporate Policy and Regeneration, Howard Simmons
- Cllr Colin Ellar
- Cllr Chatt

The Hounslow Racial Equality Council

The Hounslow Racial Equality Council promotes good race relations and provides information, advice and support for individuals and organizations. HREC members consulted include:

- Hounslow African and Caribbean Association
- Hounslow Synagogue
- Philippine Centre
- Arab Group Hounslow
- Sikh Gurudwara
- Hounslow Primary Care Trust
- Bangladesh Welfare Association
- Africa Policy Research Network
- Hounslow Refugee Forum

Hounslow Voluntary Sector Forum

The Hounslow Voluntary Sector Forum includes over 100 voluntary groups and organizations, many of which fall within one or more of the equality categories. Please refer to <http://www.hvsf.org.uk/?section=membership.list> for a detailed list of all members.

APPENDIX 5: ADDITIONAL GROUPS IDENTIFIED BY CONSULTEES

Categories	Additional Equality Groups Identified
Age	<ol style="list-style-type: none"> 1. Greater London Forum for Older People 2. Schools (generally, not just when engaging young people) 3. Elderly persons, who do not live in sheltered accommodation, belong to groups, or live in their own flat or house
Ethnicity	<ol style="list-style-type: none"> 1. Black Neighbourhood and Regeneration Network 2. Council of Ethnic Minority Voluntary Sector 3. Federation of Black Housing Organisations 4. London Gypsy and Traveller Unit 5. Travellers, Romany Gypsies 6. Other migrants
Gender	<ol style="list-style-type: none"> 1. Women groups (unspecified)
Faith	<ol style="list-style-type: none"> 1. Faith Regeneration UK 2. Diocesan Board Of Finance 3. Churches Together in Hounslow 4. Maswell Park Church 5. All churches with large involvement with children, young, older people, and human problem assistance 6. Individual churches 7. Church groups 8. People of different faith
Sexual orientation	<ol style="list-style-type: none"> 1. Stonewall 2. Gay Men's Project
Disability	<ol style="list-style-type: none"> 1. Greater London Action on Disability 2. Hounslow Homes Disability Forum

Other groups and individuals suggested, which may be representative of some or all the equality categories, include:

- Anybody who expresses interest; and
- All residents within a 100 yard radius for all planning applications

APPENDIX 6: SUPPORTING INFORMATION

Further information supporting this EIA is available from the Strategic Planning Policy Team, including:

- The Background Report on early engagement
- Meeting minutes from consultation with hard-to-reach groups, including
 - Disability Community Forum
 - Local Strategic Partnership
 - Hounslow Racial Equality Council
 - Participation
- Area Committee meeting minutes¹¹, including
 - Central Hounslow Area Planning Committee
 - Chiswick Area Planning Committee
- Participation Sub Group meeting minutes
- BMG Research Report on the Residents Panel Survey, Summer 2005
- A list of all relevant national legislation and local strategies
- A report on all representations made

The Strategic Planning Policy Team can be contacted as detailed below.

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¹¹ Please note that Heston and Cranford Area Committee, Isleworth and Brentford Area Committee and West Area Committee have noted the SCI consultation, but not provided any comments.