

Equality Impact Assessment (EqIA)

Project/Programme/Policy title (Project Initiation Document – if applicable):	LB Hounslow new ‘single’ Local Plan (<i>proposed submission version of the Hounslow Local Plan 2020-2041</i>)
Which pillars does this work respond to? <ul style="list-style-type: none"> • Pillar A: Promoting Equality by Place • Pillar B: Promoting Equality by Equality Groups • Pillar C: Promoting Equality as an Employer (see Section 5 below) 	Pillar A: Promoting Equality by Place and Pillar B: Promoting Equality by Equality Groups
Directorate:	Economy and Regeneration (Planning and Building)
Version:	1
Date:	01/06/2025
Updated by:	Duncan McKane

Please provide a brief description of the proposal/policy/project including its aim and expected outcomes:	<p><i>*This version of the EqIA has been updated following the Regulation 19 consultation of the proposed submission version of the Hounslow Local Plan 2020-2041. The assessment has taken into account any comments received in relation to this consultation that relate specifically to Equalities issues – including impacts to groups with protected characteristics.</i></p> <p>The new single Local Plan is a local development plan document that sets out the Council’s proposals for the future development of the borough over the next 15 plus years through a suite of planning policies. All local authorities are required to prepare a Local Plan with the objective of contributing to the achievement of sustainable development, addressing the spatial implications of economic, social and environmental change. There are significant benefits to an authority in having an up-to-date Local Plan in place, in terms of delivering Council priorities, and managing the location, scale and form of future development. This new single Local Plan will help enable positive development in the Borough that meets the needs of communities, addresses climate change and enhances the built and natural environment.</p>
---	---

The broad approach of the new Local Plan is to deliver sustainable development as per the national planning policy framework, and good growth as per the London Plan's strategic approach. Key objectives of the plan relate to supporting our town centres, promoting economic growth and inward investment, delivering sustainable mixed communities, reinforcing local character and context, maximising the benefits of our green and blue infrastructure, delivering community infrastructure, ensuring environmental quality, and enhancing connectivity.

Policies are proposed to achieve these aims, and as part of the review of the adopted Vol.1 Local Plan 2015 policies, various updates are now proposed to ensure these policies take the latest available evidence and other passage of time changes into account, are in line with legislation, national policy and guidance and are in general conformity with the London Plan (2021).

The plan also consolidates emerging policies and site allocations that were being taken forward through the area-based draft Vol.3 West of Borough and Vol.4 Great West Corridor plan documents, and updates to the Vol.2 Site Allocations plan document. These emerging plan documents (Vol.2-4) were intended to guide development within the two designated Opportunity Areas within the borough. The Mayor of London designates Opportunity Areas for key growth areas that have the potential to deliver a substantial amount of the new homes and jobs that London needs, and the Council had committed to undertake partial reviews to help plan for these areas in the adopted Local Plan 2015.

Vols.2-4 were progressed and submitted for examination in December 2020, but in late 2022 the Inspectors examining the plans raised some potential procedural and legal issues, and the possibility of lengthy delays to their adoption as a result. As a significant amount of time and resource had already been invested in preparing the Hounslow Local Plan Review, the Council decided to progress the Local Plan review by withdrawing the plan documents from examination, before consolidating the emerging area-based plans and borough-wide Site Allocations document with an updated version of the Vol.1 Local Plan 2015. This was identified as the quickest and most effective way for the review of the Local Plan to progress under the current system of plan-making.

It is therefore a priority for the Council to progress the new single Local Plan to ensure that we can adopt an up-to-date Local Plan to help guide sustainable

	<p>development over the coming plan period, and secure the best outcomes for our communities, as soon as possible.</p>
<p>Who is the policy/proposal/project going to affect (the protected groups below) and in what way (include positive/negative impacts)? Please use evidence to support your analysis.</p>	<p>The new Local Plan addresses the needs and opportunities of the borough for housing, employment land and essential infrastructure to support growth. The Local Plan will guide decisions on future development proposals (planning applications) in the borough. The new Local plan therefore has the potential to impact all residents within the borough, both over the plan period which it covers and beyond, given that the development approved and the places created will exist for many years to come.</p> <p>After careful consideration of the potential effects of the new Local Plan on the protected groups, the Spatial planning Team have determined the following groups may be affected in the following ways:</p> <p><u>Age</u></p> <p><i>Children and Younger People</i></p> <p>Positive:</p> <ul style="list-style-type: none"> • Support for improved schools to improve quality • Embedding Early Years provision and family support measures • Improvements for SEND education facilities supported • Improvements to open/play spaces supported • Securing contributions toward mitigating impacts on education infrastructure, and youth skills & employment initiatives • Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility and support good growth • Updates to support health & wellbeing outcomes, including active design principle and ensuring health impacts assessed and mitigated <p>Negative:</p> <ul style="list-style-type: none"> • None identified at this stage • <i>Some respondents to the Regulation 19 consultation have suggested that pupils of a local school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.</i>

Mitigation

- ***The Council consider that given this is a high-level strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to review the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.***

Older people

Positive:

- Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility and support good growth
- Updates to support health & wellbeing outcomes, including active design principle and ensuring health impacts assessed and mitigated
- Supports for the provision of appropriate specialist housing to meet the care and supported housing needs of vulnerable people, including specialist housing for older people
- Strengthened requirements for the protection of, and improvements to, allotments and other growing spaces.
- Support for measures/activities which promote creative and social interaction and increase the associated social and health & wellbeing benefits of such.
- Support for accessible (step free and wheelchair friendly) public transport and active travel improvements.
- Supporting urban design designed to be fully accessible to people with disabilities or impaired mobility.

Negative:

- None identified at this stage

Disability

Positive:

- Greater support for meeting Specialist and Supported Housing needs, including specialist accommodation to meet the needs of young and working age residents who have complex health and social care needs
- Ensuring accessible housing is secured in major developments
- Improvements for SEND education facilities supported
- Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility and support good growth
- Updates to support health & wellbeing outcomes, including active design principle and ensuring health impacts assessed and mitigated
- Support for measures/activities which promote creative and social interaction and increase the associated social and health & wellbeing benefits of such
- Support for accessible (step free and wheelchair friendly) public transport and active travel improvements
- Supporting urban design designed to be fully accessible to people with disabilities or impaired mobility

Negative:

- None identified at this stage
- ***Some respondents to the Regulation 19 consultation have suggested that pupils of a SEND school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.***

Mitigation

- ***The Council consider that given this is a high-level strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to review the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.***

Religion/Belief

Positive:

- Amendments to ensure proposals for new, expanded or improved Places of Worship fully take into account potential impacts to neighbours and the local area, thus fostering good relations & community cohesion

Negative:

- None identified at this stage

Race

Gypsy, Traveller and Travelling Showpeople

Negative:

- Whilst every effort has been made to explore a range of options to identify sufficient sites to meet the full specialist housing needs of Gypsies and Travellers and Travelling Showpeople in the new Local Plan, and two sites have been identified for allocation for these communities, due to the significant number of Gypsy and Traveller pitches and Travelling Showpeople plots required over the plan period as identified in the Gypsy and Traveller and Travelling Showperson Accommodation Needs Assessment (GTTSANA) 2019, the Plan has not been able to allocate sites that would meet the full identified need for pitches and plots for GTTS communities over the plan period. The proposed allocation sites do, however, meet the full short term (0-5 year) and medium term (6-10 year) housing needs of Travelling Showpeople in the borough, delivering 12 plots, and the vast majority of the short-term housing needs of the Gypsy and Traveller community, delivering 20 pitches.

Mitigations:

- Conduct further site capacity assessment work to establish whether we can meet identified needs on suitable and available sites earlier in the plan period
- The Council will consult affected groups as part of the Regulation 19 consultation of the new Local Plan to ensure feedback is received and any potential remedies can be considered;
- The Council will continue to plan to meet the need for pitches and plots, covering the full plan period of the new Local Plan;

- The Council will engage with the Planning Inspector/s undertaking the examination of the new Local Plan on this issue to see if any further options can be pursued, or if there are any appropriate modifications which can be made to the plan to address this; and
- When undertaking the next review of the Local Plan within 5 years of adoption, the Council will revisit the site search exercise to seek to identify further sites for meeting the remaining need for pitches and plots within the period.

Positive:

- The new Local Plan includes a policy position to retain the borough's existing Travelling Showpeople sites (including retaining the Station Estate Road site) and Gypsy and Traveller sites
- The new Local Plan has been able to make provision for sites which would meet the majority of specialist housing needs for GTTS over the plan period, including the full short term (0-5 year) needs of Travelling Showpeople, and the significant majority of the short term needs of Gypsies and Travellers.

Regulation 19 consultation update:

- ***A response was received from The Showmen's Guild of Great Britain which welcomes the release of a green belt site to provide new plots for Travelling Showpeople. The Guild requests that these plots are directed towards families of Travelling Showpeople already based and living in the borough.***
- ***A response was received from the Mayor of London requesting that LBH set out 10-year pitch targets for Gypsies, Travellers and Travelling Showpeople accommodation and establish whether the two sites identified in the plan will be able to fulfil the target over the plan period. In response, LBH will present a suggested modification to Policy SC9, including establishing 10 year pitch and plot targets, and amending policy relating to supporting enhancements to existing Gypsies, Travellers and Travelling Showpeople sites to intensify and/or expand the Hartlands site to contribute toward meeting the borough's 10 year pitch target for Gypsies and Travellers where feasible. This will be discussed in more detail at the examination hearings.***

Refugees

Positive:

- Update to include a new policy approach that supports the delivery of new or retrofitted temporary emergency accommodation that is well designed and provides a good standard of living for refugees, including those with young children

Negative:

- None identified at this stage

Pregnancy and maternity

Positive:

- Update to include a new policy approach that supports the delivery of new or retrofitted temporary emergency accommodation that is well designed and provides a good standard of living, including those with young children
- Further embedding early years provision, family support and associated school improvements in education policy

Negative:

- None identified at this stage

Other groups with protected characteristics

The Council has considered the potential for impact on the following groups: Sex, Gender Reassignment, Sexual Orientation, and Young Care Leavers. It is considered that the new Local Plan is unlikely to have either a direct positive or negative impact upon these protected groups which would require further assessment. This will be kept under review, and should any potential impact be identified during consultation or the examination in public, this will be reassessed, and suitable and appropriate mitigation will be sought if necessary.

Relevance Test/Screening Assessment for whether an initial EqIA is required:

Instructions	Descriptor	Score	Potential impact on equality groups/individual(s)	The potential for complaint/litigation	Impact scoring consideration
<p>Use the scoring matrix shown in the key. Then outline your rationale for that score in the comments section.</p>	Very high	4	Severe impact causing disadvantage to all or some equality groups or individuals – leading to a breach in equality legislation.	Litigation certain.	Must undertake full EqIA and work with the Equalities team.
	High	3	Substantive impact on all or some equality groups or individuals – leading to a breach in equality legislation.	Expect litigation/resident petitions, etc.	Savings proposal/service closure/changes to eligibility criteria/changing policies/disruption to services. Must undertake full EqIA and work with Equalities team.
	Moderate/medium	2	Impact on some equality groups or individuals likely.	Litigation possible but not certain. High potential for complaint.	Moderate impact – seek advice from Equalities team.
	Low	1	Some remote impact for some groups or individuals – mitigation needs to be included in main Cabinet report.	Complaint and litigation unlikely.	If there is some minimal risk to organisation, undertake an initial EqIA.
	Negligible impact	0	No impact or adverse outcome for any equality groups or individuals.	Unlikely to cause complaints/litigation	If there is no risk at all to the organisation, identify legal duty in main report and use standard equality

Equality Impact Assessment (EqIA)

					text to show that you have considered the Equality Act 2010 and concluded neither positive nor negative impact.
--	--	--	--	--	---

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
Age	0	<p>The Council has considered the potential for impact on this group, focusing on children and younger people, and older people.</p> <p><i>Children and Younger People</i></p> <p>For younger people, the new Local Plan proposed various updates to policies which cover important planning considerations which effect this group, including around the provision of schools and education facilities, community infrastructure, health facilities and healthy places, and the provision of play space and sports facilities. It is considered that these policies will have an overall positive influence on individuals within this broad age bracket.</p> <p>The key policy most likely to influence the lives of children and younger people is Policy CI2 'Education And School Places' which relates to the provision of education facilities and school places which cater for the demand for places within Hounslow. The proposed policy amendments:</p> <ul style="list-style-type: none"> • promote improvements to education facilities and schools to ensure buildings are up to modern day expectations in terms of environmental performance and building standards, in order to make schools (and neighbourhoods) more attractive; • further embed early year, family support and school improvements (in light of the changing statutory responsibilities of the local authority); • ensure SEND provision is protected and improved, including new, extended or reconfigured facilities to ensure a high-quality learning environment is created for SEND students and students with reduced mobility (see Disability below); • support improvements to school open and play space for schools, which links to related policy GB3 'Open Space In Education Use' which seeks to carefully manage situations where the delivery of expanded or new education facilities onto open space with an existing education use is proposed; 	<p><i>Children and Younger People</i></p> <p>Positive:</p> <ul style="list-style-type: none"> • Support for improved schools to improve quality • Embedding Early Years provision and family support measures • Improvements for SEND education facilities supported • Improvements to open/play spaces supported • Securing contributions toward mitigating impacts on education infrastructure, and youth skills & employment initiatives • Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility and support good growth • Updates to support health & wellbeing outcomes, including active design principle

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<ul style="list-style-type: none"> require developers to mitigate the impact of development on community/education infrastructure through contributions, including to youth skills & employment initiatives <p>Other policies likely to have an impact on younger people are:</p> <ul style="list-style-type: none"> Policy CI1 'Community Infrastructure' has been amended to ensure the LPA continues to protect and improve existing community facilities (such as youth clubs, leisure facilities and other social infrastructure) that continue to serve the community, and direct new and enhanced community facilities to the most appropriate locations to help tackle inequality and support good growth, with updates relating explicitly to designing new community facilities so that they are more accessible and inclusive, and flexible enough to accommodate a range of uses in line with a co-location approach. Ensuring community facilities which serve younger people continue to be protected and enhanced through future development would have a positive impact on this group. Policy CI3 'Health Facilities And Healthy Places' – while not referring explicitly to younger people – has been updated to support new and enhanced health facilities and services which have been identified by the NHS and the Public Health team, especially in those areas which have been targeted for improvements to health outcomes. The policy has also been updated to further embed the need for new developments to incorporate active design principles within scheme design, and undertake health impact assessments (HIA) to identify potential negative impacts and deliver necessary mitigation measures, in order to protect and enhance the health and wellbeing of all residents (irrespective of age, or any other protected characteristic). Policy CI4 Culture and Leisure Facilities has been updated to include support for interventions and activities that promote creativity and social interaction through increasing the cultural and leisure offer of the area, such as festivals, theatre 	<p>and ensuring health impacts assessed and mitigated</p> <p>Negative:</p> <ul style="list-style-type: none"> None identified at this stage <i>Some respondents to the Regulation 19 consultation have suggested that pupils of a local school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.</i> <p>Mitigation</p> <ul style="list-style-type: none"> <i>The Council considers that given this is a high-level</i>

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>performances, community arts, pop up cafes, open air cinema and music events. By ensuring future development considers ways in which culture and leisure facilities and related interventions can be supported, the policy aims to ensure children and young people are able to participate in cultural events, and experience the associated social and emotional benefits.</p> <ul style="list-style-type: none"> Policy GB9 – ‘Playspace, Outdoor Sports Facilities and Burial Space’ has been updated to ensure that new play and sports facilities outlined in the Playing Pitch Strategy and Green and Blue Infrastructure Strategy are supported, which will ensure provision is delivered in line with the latest evidence of local needs. The play space policy has also been updated to add references to informal recreation spaces and child friendly public realm, and to target creation of new/enhancements of existing play spaces in areas of deficiency – thus addressing spatial inequality implications of existing under-provision. The policy also links to play space standards set out in the London Plan and other Hounslow strategies, which will ensure these are designed to a high standard. <p><u>Regulation 19 Consultation Update</u> <i>Some respondents to the Regulation 19 consultation have suggested that pupils of a local school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.</i></p> <p><i>The Council considers that given this is a high-level strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to</i></p>	<p><i>strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to review the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.</i></p> <p>Older people</p> <p>Positive:</p> <ul style="list-style-type: none"> Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p><i>review the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.</i></p> <p><i>Older People</i> For older people, the new Local Plan proposed various updates to policies which cover important planning considerations which effect this group, including the adequate provision of older persons specialist and supported housing, the protection and enhancement of open spaces (including allotments), the provision of community infrastructure, health facilities and the creation of healthy places, and support for a sustainable public transport system. It is considered that these policies will have an overall positive influence on individuals within this broad age bracket.</p> <p>Key policies include:</p> <ul style="list-style-type: none"> • Policy SC8 ‘Specialist and Supported Housing’ supports the provision of appropriate housing to meet the care and supported housing needs of vulnerable local people, including specialist housing for older people. The policy sets out the strategic aim of minimising the use of residential care and nursing homes when vulnerable people could otherwise be supported to live more independently and/or with appropriate support in their local community. The policy has been updated to ensure that: <ul style="list-style-type: none"> ○ the housing needs of older people will primarily be met through conventional housing designed to be accessible and adaptable as per local evidence ○ specialist housing is delivered to support the annual target for 73 additional specialist older persons homes (of which 52 are for housing with support and 21 are 	<p>and support good growth</p> <ul style="list-style-type: none"> • Updates to support health & wellbeing outcomes, including active design principle and ensuring health impacts assessed and mitigated • Supports for the provision of appropriate specialist housing to meet the care and supported housing needs of vulnerable people, including specialist housing for older people • Strengthened requirements for the protection of, and improvements to, allotments and other growing spaces. • Support for measures/activities which promote creative and social interaction and increase the associated social and health & wellbeing benefits of such. • Support for accessible (step free and

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>for housing with care) in Hounslow derived from local evidence</p> <ul style="list-style-type: none"> ○ the need for 17 care and nursing home bedspaces per annum in the borough is met, as per local evidence ○ a requirement for proposals for specialist older persons housing to deliver affordable units to ensure more people are able to access this, in line with the London Plan approach ○ Definitions for specialist older persons housing types are appropriate (i.e. 'Housing with Support' – e.g. Retirement Living or Sheltered Housing, and 'Housing with Care' e.g. Extra Care or Enhanced Sheltered housing, also known as Assisted Living). <p>Together these changes will ensure there is greater access to specialist and supported housing for older people, and the quality of the accommodation is improved to ensure greater accessibility and adaptability</p> <ul style="list-style-type: none"> ● Policy SC3 – 'Meeting the Need for a Mix of Housing Size and Type' has been updated to embed the London Plan approach toward requiring a greater number of dwellings to be either accessible and adaptable (90%) or fully accessible for wheelchair users (10%). This will provide further clarity on how we expect housing developments to cater for older people with additional mobility and other accessibility needs, and will ultimately lead to greater delivery of accessible housing in the borough. ● Policy CI1 'Community Infrastructure' has been amended to ensure the LPA continues to protect and improve existing community facilities (such as social clubs, leisure facilities and other social infrastructure) that continue to serve the community, and direct new and enhanced community facilities to the most appropriate locations to help tackle inequality and support good growth, with updates relating explicitly to designing new community facilities so that they are more accessible and inclusive, and flexible enough to accommodate 	<p>wheelchair friendly) public transport and active travel improvements.</p> <ul style="list-style-type: none"> ● Supporting urban design designed to be fully accessible to people with disabilities or impaired mobility. <p>Negative:</p> <ul style="list-style-type: none"> ● None identified at this stage

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>a range of uses in line with a co-location approach. Ensuring community facilities which serve older people continue to be protected and made more accessible through future development would have a positive impact on this group.</p> <ul style="list-style-type: none"> • Policy CI4 Culture and Leisure Facilities has been updated to include support for interventions and activities that promote creativity and social interaction through increasing the creative, cultural and leisure offer of the area, such as festivals, theatre performances, community arts, pop up cafes, open air cinema and music events. By ensuring future development considers ways in which culture and leisure facilities and related interventions can be supported, the policy aims to ensure older people are still able to participate in shared cultural events which aim to address loneliness and promote good health & wellbeing outcomes. • Policy CI3 'Health Facilities And Healthy Places' – while not referring explicitly to older people – has been updated to support new and enhanced health facilities and services which have been identified by the NHS and the Public Health team, especially in those areas which have been targeted for improvements to health outcomes. The policy has also been updated to further embed the need for new developments to incorporate active design principles within scheme design, and undertake health impact assessments (HIA) to identify potential negative impacts and deliver necessary mitigation measures, in order to protect and enhance the health and wellbeing of all residents (irrespective of age, or any other protected characteristic). It is recognised that older people can have more pronounced health needs than other age groups, so the focus on improving local health facilities and services so they continue to meet the needs of residents would have a positive impact on this group. • Policy GB8 'Allotments, Agriculture and Local Food Growing' has been updated to strengthen requirements for the protection of, and improvements to, allotments and other 	

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>growing spaces which may be impacted by development proposals. Local evidence suggests allotment use in the borough is highest amongst those aged 60 plus (equating to 65% of allotment holders surveyed), so it is anticipated that this policy will have a particular positive impact on older people who engage in allotment gardening.</p>	
<p>Disability</p>	<p>0</p>	<p>The Council has considered the potential for impact on this group. Overall it is considered that the policies and proposals in the new Local Plan will have a positive impact on the lives of those with disabilities. Key policies which are likely to have a positive impact on those with disabilities are set out below:</p> <ul style="list-style-type: none"> • Policy SC8 ‘Specialist and Supported Housing’ supports the provision of appropriate housing to meet the care and supported housing needs of vulnerable local people, including specialist housing for those with disabilities. The policy sets out the strategic aim of minimising the use of residential care and nursing homes when vulnerable people could otherwise be supported to live more independently and/or with appropriate support in their local community. The policy has been updated to ensure that: <ul style="list-style-type: none"> ○ the need for 17 care and nursing home bedspaces per annum in the borough is met, as per local evidence ○ providing specific policy support for appropriate proposals for specialist accommodation to meet the needs of young and working age residents who have complex health and social care needs. <p>Together these changes will ensure there is greater access to specialist and supported housing for those with disabilities, and the quality of the accommodation is improved to ensure greater accessibility and adaptability of housing.</p> • Policy SC3 – ‘Meeting the Need for a Mix of Housing Size and Type’ has been updated to embed the London Plan approach 	<p>Positive:</p> <ul style="list-style-type: none"> • Greater support for meeting Specialist and Supported Housing needs, including specialist accommodation to meet the needs of young and working age residents who have complex health and social care needs • Ensuring accessible housing is secured in major developments • Improvements for SEND education facilities supported • Community infrastructure protected and new/enhanced facilities supported to tackle inequality, increase accessibility and support good growth

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>toward requiring a greater number of dwellings to be either accessible and adaptable (90%) or fully accessible for wheelchair users (10%). This will provide further clarity on how we expect housing developments to cater for those with additional mobility and other accessibility needs, and will ultimately lead to greater delivery of accessible housing in the borough.</p> <ul style="list-style-type: none"> • Policy CI2 'Education And School Places' relates to the provision of education facilities and school places which cater for the demand for places within Hounslow. Further updates are proposed to ensure SEND provision is protected and improved, including new, extended or reconfigured facilities to ensure a high-quality learning environment is created for SEND students and students with reduced mobility. This approach will provide greater strategic support for schemes which seek to refurbish or redevelop existing SEND schools and educational facilities - or develop new facilities - to better serve the needs of SEND students and improve learning opportunities. • Policy CI3 'Health Facilities And Healthy Places' – while not referring explicitly to those with disabilities – has been updated to support new and enhanced health facilities and services which have been identified by the NHS and the Public Health team, especially in those areas which have been targeted for improvements to health outcomes. The policy has also been updated to further embed the need for new developments to incorporate active design principles within scheme design, and undertake health impact assessments (HIA) to identify potential negative impacts and deliver necessary mitigation measures, in order to protect and enhance the health and wellbeing of all residents. It is recognised that those with disabilities can have more complex health needs than other groups, so the focus on improving local health facilities and services so they can continue to meet the needs of all 	<ul style="list-style-type: none"> • Updates to support health & wellbeing outcomes, including active design principle and ensuring health impacts assessed and mitigated • Support for measures/activities which promote creative and social interaction and increase the associated social and health & wellbeing benefits of such • Support for accessible (step free and wheelchair friendly) public transport and active travel improvements • Developments are to be designed to be fully accessible to people with disabilities or impaired mobility <p>Negative:</p> <ul style="list-style-type: none"> • None identified at this stage • <i>Some respondents to the Regulation 19 consultation have suggested that pupils</i>

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>residents – new and existing - would have a positive impact on this group.</p> <ul style="list-style-type: none"> • Policy CI4 Culture and Leisure Facilities has been updated to include support for interventions and activities that promote creativity and social interaction through increasing the creative, cultural and leisure offer of the area, such as festivals, theatre performances, community arts, pop up cafes, open air cinema and music events. By ensuring future development considers ways in which culture and leisure facilities and related interventions can be supported, the policy aims to ensure those with disabilities are still able to participate in shared cultural events which aim to address exclusion and promote good health & wellbeing outcomes for all. • Policy EC1 – ‘Strategic Transport Connections’ has been updated with a renewed focus on creating a more accessible public transport network through supporting upgrades for step-free access at stations, and an approach to prioritising walking and wheeling to create an accessible active travel network. • Policy CC2 ‘Urban Design and Architecture’ requires that developments are designed to be fully accessible to people with disabilities or impaired mobility <p><u>Regulation 19 Consultation Update</u></p> <p><i>Some respondents to the Regulation 19 consultation have suggested that pupils of a SEND school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.</i></p>	<p><i>of a SEND school in the vicinity of the Land at Hatton Fields Site would be negatively impacted by any development on this site, particularly in terms of a reduction of access to open space, air pollution impacts associated from proposed uses, and public safety concerns related to increased vehicle movements on nearby roads.</i></p> <p>Mitigation</p> <ul style="list-style-type: none"> • <i>The Council considers that given this is a high-level strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to review</i>

Equality Impact Assessment (EqIA)

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p><i>The Council considers that given this is a high-level strategic policy there are no specific equalities impacts which require further consideration or mitigation at this stage. Should a development proposal come forward, the Council will be able to review the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.</i></p>	<p><i>the specific details of the proposal, make a further assessment of any potential equalities impacts affecting this group and put in place any mitigations to address this as may be required.</i></p>
<p>Sex</p>	<p>0</p>	<p>The Council has considered the potential for impact on this group. The new Local Plan is unlikely to have either a positive or negative impact upon this protected group which would require further assessment. This will be kept under review, and should any potential impact be identified during consultation or the examination in public, this will be reassessed, and suitable and appropriate mitigation will be sought if necessary.</p>	<p>No impacts (positive or negative) identified at this stage</p>
<p>Gender Reassignment</p>	<p>0</p>	<p>The Council has considered the potential for impact on this group. The new Local Plan is unlikely to have either a positive or negative impact upon this protected group which would require further assessment. This will be kept under review, and should any potential impact be identified during consultation or the examination in public, this will be reassessed, and suitable and appropriate mitigation will be sought if necessary.</p>	<p>No impacts (positive or negative) identified at this stage</p>

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
<p>Religion/Belief</p>	<p>0</p>	<p>The Council has considered the potential for impact on this group. The key Local Plan policy which may impact upon this protected group is Policy CI5 - Places of Worship which seeks to enable the many religions in the borough to establish an appropriate place to worship, and to celebrate the cultural and religious diversity in the borough without adverse effect on others in the borough (particularly those in the immediate surrounding area). The policy supports the delivery of new, expanded and improved places of worship (PoW) which address the issues of impact on the surrounding area.</p> <p>Minor updates are proposed to clarify that a range of important criteria for addressing the potential impacts of PoW apply not only to new development of PoW, but also for any development proposals which involve the expansion or improvement of existing facilities. This will ensure that expanded or improved PoW are also required to demonstrate that the development meets an identified need and is of an appropriate scale; that it would not have a severe adverse impact on residential amenity and that any mitigation will be delivered in line with the Agent of Change principle (as per national and London Plan Policy); that noise pollution impacts are considered and mitigated in line with the Agent of Change principle; and that sufficient off-street car parking to accommodate anticipated users is provided in line with London Plan parking standards.</p> <p>It is anticipated that these minor updates will continue to ensure that any unintended severe adverse impacts resulting from proposals for new/expanded PoW will be properly addressed through the planning process, thus fostering good relations & community cohesion between members of religious communities and surrounding neighbours. It is therefore considered that the overall impact on this group will be positive.</p>	<p>Positive:</p> <ul style="list-style-type: none"> • Amendments to ensure proposals for new, expanded or improved Places of Worship fully take into account potential impacts to neighbours and the local area, thus fostering good relations & community cohesion <p>Negative:</p> <ul style="list-style-type: none"> • None identified at this stage

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
Sexual Orientation	0	<p>The Council has considered the potential for impact on this group. The new Local Plan is unlikely to have either a positive or negative impact upon this protected group which would require further assessment. This will be kept under review, and should any potential impact be identified during consultation or the examination in public, this will be reassessed, and suitable and appropriate mitigation will be sought if necessary.</p>	<p>No impacts (positive or negative) identified at this stage</p>
Race (including Travellers, Refugees, White Working-Class residents, etc)	1	<p>The Council has considered the potential for the new Local Plan to have an impact on individuals and communities belonging to various racial groups, including those with black and minority ethnic (BAME) backgrounds; those seeking asylum or currently seeking refuge in the UK (refugees); Gypsy, Traveller and Travelling Showpeople; and any other nationality or ethnicity which may be affected by direct or indirect racial discrimination.</p> <p>The Council has had regard to the following groups and communities and the ways in which policies and proposals set out in the new Local Plan may result in either positive or negative impacts.</p> <p><i>Gypsy, Traveller and Travelling Showpeople</i></p> <p>Throughout the preparation of the new Local Plan, the Council has made every effort to identify and allocate sufficient sites to meet the specialist housing needs of the Gypsy and Traveller and Travelling Showpeople (GTTS) communities as identified in the Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment (GTTSANA) 2019.</p> <p>The new Local Plan includes a policy position to retain the borough's existing Travelling Showpeople sites (including retaining the Station Estate Road site) and Gypsy and Traveller sites.</p>	<p><i>Gypsy, Traveller and Travelling Showpeople</i></p> <p>Negative</p> <ul style="list-style-type: none"> The new Local Plan has not been able to allocate a sufficient number of sites to meet the full identified need for pitches and plots for Gypsy, Traveller and Travelling Showpeople communities over the plan period. <p>Mitigations:</p> <ul style="list-style-type: none"> Conduct further site capacity assessment work to establish whether we can meet identified needs on suitable and available sites earlier in the plan period

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>In early 2022 the Council undertook a targeted call for sites exercise to find suitable sites to meet GTTS accommodation needs over the plan period. The exercise resulted in 2 potential sites for GTTS communities being suggested by private landowners. The Council also extensively reviewed its own land for potential allocations as a GTTS site.</p> <p>Having reviewed this information, the Council produced a GTTS Site Search Study (Site Allocations and Capacity Assessment GTTS Addendum) which assessed 28 potential sites (including the 2 sites put forward by private landowners and the other 26 being the Council owned sites). Engagement was also undertaken with the Travelling Showpeople community and the Guild of Showpeople, and the London Gypsies and Travellers Group to ensure their views were taken on board.</p> <p>The GTTS Addendum study identified one suitable site in the Feltham area to contribute to meeting the identified housing needs for the Travelling Showpeople community, in addition to retaining existing Showpeople sites in the borough – this site was also the Travelling Showpeople community’s preferred site as advised at a May 2022 meeting with officers and members of the Council. The GTTS Addendum also identified one suitable site in the Cranford area, nearby the existing Hartlands traveller site to contribute to meeting the identified housing needs for the Gypsy and Traveller communities, in addition to retaining existing Gypsy and Traveller sites in the borough.</p> <p>The two identified sites are proposed for allocation in the new Local Plan and will contribute to meeting the identified housing needs of the GTTS communities over the plan period. In undertaking this work, officers explored all reasonable options for identifying sites, as</p>	<ul style="list-style-type: none"> • The Council will consult affected groups as part of the Regulation 19 consultation of the new Local Plan to ensure feedback is received and any potential remedies can be considered; • The Council will continue to plan to meet the need for pitches and plots, covering the full plan period of the new Local Plan; • The Council will engage with the Planning Inspector/s undertaking the examination of the new Local Plan on this issue to see if any further options can be pursued, or if there are any appropriate modifications which can be made to the plan to address this; and • When undertaking the next review of the Local Plan within 5 years of adoption, the Council will revisit the site search exercise to see if any further sites have

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>outlined above, engaging with both landowners who submitted sites to the Council, as well as the detailed assessment of Council owned land. This is all documented in the Site Allocations and Capacity Assessment GTTS Addendum, which will be published as evidence supporting the new Local Plan.</p> <p>The proposed Travelling Showpeople site allocates 12 plots, which meets both the short term (0-5 year) and medium term (6-10 year) Travelling Showpeople plot needs. This is by far the majority of the overall housing need for Travelling Showpeople over the plan period, which is for 15 plots. The proposed Gypsy and Traveller site allocates 20 pitches, which meets almost all of the short term (0-5 year) Gypsy and Traveller pitch needs, which is for 23 pitches.</p> <p>It is important to note that national planning policy requires plan making authorities to review their Local Plan every five years. There will therefore be opportunities to further review the GTTS housing needs and ability to meet the full needs through new site searches. As such, the Council can work to identify further plots for Travelling Showpeople and pitches for Gypsies and Travellers in subsequent Local Plan reviews, to meet the long term housing needs of both communities.</p> <p>In addition, whilst it has not been possible to meet the full GTTS accommodation needs within the new Local Plan, this does not mean that further sites might not come forward through so-called 'windfall' development (i.e. planning proposals on non-allocated sites). Should development proposals for GTTS accommodation come forward in this way, they would be supported provided they were in line with our Policy SC9 'Gypsy and Traveller and Travelling Showpeople' and other relevant policies within the development plan.</p>	<p>become available which could meet the remaining need for pitches and plots within the period in question.</p> <ul style="list-style-type: none"> <p><i>In response to a representation from the Mayor of London, LBH agree to propose a suggested modification to Policy SC9 to include establishing 10 year pitch and plot targets, and amending policy relating to supporting enhancements to existing GTTS sites to intensify and/or expand the Hartlands site to contribute toward meeting the borough's 10 year pitch target for Gypsies and Travellers where feasible. This will be discussed in more detail at the examination hearings.</i></p> <p>Positive</p> <ul style="list-style-type: none"> <p>The new Local Plan includes a policy position to retain the</p>

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>The Council has considered the potential impacts (both direct and indirect) upon GTTS communities resulting from an inability to allocate a sufficient number of sites to meet the full identified need for pitches and plots. The Council considers there to be a minimal indirect negative impact to GTTS communities given that members of these communities may find it harder to find suitable accommodation in their local area in coming years. The mitigation measures proposed to address this impact are outlined below:</p> <ul style="list-style-type: none"> • The Council will consult affected groups as part of the Regulation 19 consultation of the new Local Plan to ensure feedback is received and any potential suggestions can be considered; • The Council will continue to plan to meet the majority of pitches and plots, to meet identified needs over the plan period; • The Council will engage with the Planning Inspector/s undertaking the examination of the new Local Plan on this issue to see if any further options can be investigated, or if there are any appropriate modifications which can be made to the plan to address this; • When undertaking the next review of the Local Plan within 5 years of adoption, the Council will revisit the site search exercise to see if any further sites have become available which could meet the remaining need for pitches and plots within the period in question. <p><u>Regulation 19 Consultation Update:</u> <i>A response was received from The Showmen's Guild of Great Britain which welcomes the release of a green belt site to provide new plots for Travelling Showpeople. The Guild requests that these plots are directed towards families of Travelling Showpeople already based and living in the borough.</i></p> <p><i>A response was received from the Mayor of London requesting that LBH set out 10-year pitch targets for GTTS accommodation</i></p>	<p>borough's existing Travelling Showpeople sites (including retaining the Station Estate Road site) and Gypsy and Traveller sites</p> <ul style="list-style-type: none"> • The new Local Plan has been able to make provision for sites which would meet the majority of specialist housing needs for GTTS over the plan period <p>Refugees</p> <p>Positive</p> <ul style="list-style-type: none"> • Update to include a new policy approach that supports the delivery of new or retrofitted temporary emergency accommodation that is well designed and provides a good standard of living for refugees, including those with young children <p>Negative:</p> <ul style="list-style-type: none"> • None identified at this stage

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p><i>and establish whether the two sites identified in the plan will be able to fulfil the target over the plan period. In response, LBH will present a suggested modification to Policy SC9, including establishing 10 year pitch and plot targets, and amending policy relating to supporting enhancements to existing GTTS sites to intensify and/or expand the Hartlands site to contribute toward meeting the borough's 10 year pitch target for Gypsies and Travellers where feasible. This will be discussed in more detail at the examination hearings.</i></p> <p>Refugees</p> <p>Policy SC10 'Housing in Multiple Occupation, Hostels, Bed & Breakfast, Temporary, and Emergency Accommodation' has been updated to include a new policy approach that supports the delivery of new or retrofitted temporary emergency accommodation that is well designed and provides a good standard of living for those that require this accommodation, including families and young people. It is considered that this will have a positive impact on those with refugee status who are placed in temporary emergency accommodation by ensuring the design of this accommodation is of the highest quality and takes people's various needs into account, thus ensuring better health and wellbeing outcomes for these individuals and families until longer term housing options become available. It is also hoped that by taking a more active approach to this issue through the local plan, the Council may avoid issues</p>	
Pregnancy and maternity	0	<p>The Council has considered the potential for impact on this group. Whilst it is considered that there will be no potential for negative impacts resulting from the new local plan, the following policy update is considered to have a potentially positive impact on this group.</p>	<p>Positive</p> <ul style="list-style-type: none"> Update to include a new policy approach that supports the delivery of new or retrofitted temporary

Equality Impact Assessment (EqIA)

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
		<p>Policy SC10 'Housing in Multiple Occupation, Hostels, Bed & Breakfast, Temporary, and Emergency Accommodation' has been updated to include a new policy approach that supports the delivery of new or retrofitted temporary emergency accommodation that is well designed and provides a good standard of living for Hounslow residents including families and young people. It is considered that this will have a positive impact on those individuals who are pregnant or caring for young children who are placed in temporary emergency accommodation by ensuring the design of this accommodation is of the highest quality and takes family accommodation needs (as set out in recognised guidelines) into account, thus ensuring better health and wellbeing outcomes for these individuals and families until longer term housing options become available.</p> <p>Policy CI2 'Education And School Places' relates to the provision of education facilities and school places which cater for the demand for places within Hounslow. One of the key proposed policy amendments is further embeds early years provision, family support and associated school improvements in light of the changing statutory responsibilities of the local authority. It is considered that this will have a positive impact upon</p>	<p>emergency accommodation that is well designed and provides a good standard of living, including those with young children</p> <ul style="list-style-type: none"> • Further embedding early years provision, family support and associated school improvements in education policy <p>Negative:</p> <ul style="list-style-type: none"> • None identified at this stage
Young Care Leavers*	0	<p>The Council has considered the potential for impact on this group. Beyond those positive impacts already set out above pertaining to children and younger people (see Age section above), the new Local Plan is unlikely to have either a positive or negative impact upon this protected group which would require further assessment. This will be kept under review, and should any potential impact be identified during consultation or the examination in public, this will be reassessed, and suitable and appropriate mitigation will be sought if necessary.</p>	<p>No impacts (positive or negative) identified at this stage</p>

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
Total Score:	1		
How does your proposal/project/policy respond to the 30 Equality Opportunity areas?		<p>The 30 Equal Opportunity Areas (EOA) are located throughout the borough. All but 5 of these areas are located within the Heathrow Opportunity Area (which covers the west of the borough, west of Hounslow Town Centre). Of the remaining 5 EOA, 3 areas (Brentford East, Brentford Central and Kew Bridge & Gunnersbury Park) are located in close proximity and/or partially overlap with the Great West Corridor Opportunity Area and Brentford Town Centre. The Heathrow Opportunity Area and the Great West Corridor Opportunity Area are designated by the Mayor of London's through the London Plan. Opportunity Areas are recognised as key growth areas and have the potential to deliver a substantial amount of the new homes and jobs that London needs. The new Local Plan sets out various place-based policies and proposals which aim to unlock the benefits of regeneration in these areas, and support improvements to the homes, workplaces, local environment, and infrastructure.</p> <p>The new Local Plan will be the local development plan document for the entire borough. The new Local Plan seeks to ensure that the borough develops in a sustainable way, in line with the Mayor's good growth objectives, and that housing and employment needs are met whilst providing necessary supporting infrastructure and environmental improvements.</p> <p>It is considered that the new Local Plan will support improvements in and around all 30EOA, and lead to good growth in these locations which will address the various inequality issues faced by each.</p>	
How does your proposal/project/policy give due regard to other equality and human rights duties? (see overview for Human Rights Articles		<p>The Council has considered the likely impacts that the new Local Plan would have with regard to other equality and human rights duties. It is considered the new Local Plan will not breach any of the Human Rights Articles (2-14) and - due to the focus on planning to provide a sufficient number of high quality, affordable homes; appropriate employment opportunities and vibrant town centres; well designed, safe and attractive places; and the appropriate transport, community green and blue infrastructure to support growth – the new Local Plan would in fact contribute positively to the Council be able to abide by the following articles in particular:</p> <p>Article 8 - The protection of private and family life Article 9 - Freedom of thought, conscience and religion Article 10 - Freedom of expression Article 11 - Freedom of association and assembly Article 12 - The right to marry and found a family</p>	

Protected characteristic	Score	Issues and rationale for scoring	Describe positive/negative impact (no scoring required).
<p>Fostering good relations & community cohesion</p>		<p>The Council has considered the likely impacts that the new Local Plan would have upon fostering good relations & community cohesion.</p> <p>The new Local Plan has a strong focus on delivering sustainable, mixed communities – with sufficient well designed and affordable homes to meet the needs of a growing population. The new Local Plan also focuses on supporting our town centres; promoting economic development and providing employment opportunities; delivering attractive, well-designed places which celebrate local context and character; delivering the essential transport, green & blue and community infrastructure to support growth and enhance connectivity; and policies which seek to protect and enhance the environmental quality of the borough, including addressing climate change, air quality and other pollution/contamination issues relating to development which can impact communities.</p> <p>For these reasons it is considered that the new Local Plan will foster good relations & community cohesion. It is important to remember that the new Local Plan is a development plan document which will be used to inform Council decisions on planning applications. Planning is inherently political and planning proposals and decisions can lead to conflict between various community groups and stakeholders depending on the issues at hand. Where specific site-based issues have the potential for negative impacts on the ability to foster good relations and community cohesion, it will be necessary for officers to have due regard to these issues and undertake any impact assessments that may be required to support a planning decision.</p>	

- Using the scoring indicators below, please score your work. Could your work have a negative impact on any of the protected characteristic/equality groups (i.e. it could disadvantage them) or could it have a positive impact on any of the groups? Please indicate in the column below your assessment of positive impact. If there is no equality impact to your work, please state 'no impact' for each group.

If your relevance test (above), to decide whether the equality duty is engaged, scores less than 10 points and you have no individual scores of greater than 1 (for each characteristic), then your relevance test ends here. You must make sure that your Cabinet report/single Member report/policy/project sets out that you have given regard to the equality duty under the equality section.

Please see link: [Standard Equality text for your report .docx](#)

Please review and update this regularly throughout the life cycle of your work, if you have any changes that affect the impact on the protected groups - e.g. after the consultation.

You do not need to carry out an initial EqIA if there is only a positive impact. Please highlight this in your report, project and/or proposal. Please note that a significant impact can also refer to impact on individuals, as well as an equality group.

If you have any individual scores greater than 1, or if your overall score is over 10 then you will need to complete the initial EqIA (below) immediately.

**Please Note: In all EqIAs the Council has agreed to include due regard to the impact for Care Leavers of your policy, strategy, project, programme or procedure. As there is growing awareness and an increasing body of research regarding the stigma and prejudice often encountered by care-experienced young adults. It is important that we acknowledge the additional barriers care-experienced young adults may face, and how these affect their ability to lead happy and fulfilled lives.*

Care leavers are often vulnerable young adults: they are more likely to experience multiple disadvantages as their status as care leavers can be compounded further by their personal characteristic on grounds of race, gender, disability, religion/belief, sexual orientation and gender and pregnancy.

Every care leaver may experience overlapping forms of discrimination or disadvantage based on these intersectional personal attributes whilst also fronting their own unique experiences of discrimination and oppression as care leavers.

'Care Leavers' as a protected group has been included in all Equality Impact Assessments to signal to all Council services and staff the importance of considering the needs of care leavers in all our decision making.

The EqIA can shine a light on the experiences of care leavers and identify actions that can contribute and make the most difference to their lives. It also provides a clearer statement that the entire Council has a critical role as a Corporate parent for improving the life chances of care leavers. By including the Equality Impact assessment to include care leavers, the Council can demonstrate how and where services, policies and programmes have carefully considered the needs of care leavers. It can provide increased assurance about the inclusiveness and quality of the services being provided to all care leavers and help identify areas for improvements.

Currently, Part 3 of the Equality Act 2010 sets out the general principles that local authorities must have regard to in exercising their powers and duties in the case of children and young people. The principles are based on improving services for children and young people with special educational needs. They seek to ensure that local authorities place children, young people and families at the centre of decision making, enable them to participate in a fully informed way, and with a focus on achieving the best possible outcomes. Whilst Care Leavers are not specifically referenced as a Protected Equality characteristic under the Equality Act 2010, the duty not to discriminate on grounds of Age is a legal requirement and the current EDI Strategy includes Young People as an Equality priority group.

Advancing equality of opportunity for care leavers is consistent with our EDI ambition to promote a fairer and more equal Hounslow for all vulnerable groups and the Council will revise the EDI Action Plan priorities, Equality Impact Assessment and Equality Groups in support of the motion. If there are no Equality Impact for Care Leavers, please state that under 'Age' in your assessment.

Initial Equality Impact Assessment (EqIA):

2. **Based on your response to Question 1, please think about who will be impacted. Please specify the equality groups and the organisations you are consulting (if not consulting, please indicate).**

3. **If you are consulting, please state when and how long your consultation period is. You will need to provide alternative formats for your consultation (easy-read, braille, large print, audio, BSL etc), please factor this into your consultation period and describe the formats you have selected. Please note, alternative formats will take longer to transcribe, and all groups should have the same time to respond.**

4. **As part of this assessment, research or evidence you have undertaken, please state what additional changes have been made to the project/ policy/plan/proposal/decision.**

If consultation was undertaken and is completed - please describe what your consultation feedback was and any emerging equalities issues. Please submit an appendix with your consultation feedback and responses.

5. **Based on the consultation responses, please explain what actions you plan to take to minimise (or mitigate) any disadvantages raised. Please describe how you are giving due regard to the 'EDI Objectives' in the section below.**

Set out how your Strategy/Policy/Project/Programme/ Action Plan will contribute to the EDI pillars below (see [EDI Strategy and Action Plan](#) for more information):

Pillar 1 – Promoting Equality by Place

Pillar 2 – Promoting Equality for Equality Groups

Pillar 3 - Promoting Equality as an Employer

Where the equality analysis indicates a potential impact, consideration should be given to means of reducing or mitigating the effects. At this stage an Action Plan should be developed to address any concerns/issues raised in your analysis. The action plan should be adopted as Equality Objectives and integrated in your Service or Business Plan.

Equality Action Plan

Issue	Action Required	Which pillars does this work respond to?	Lead Officer	Timescale	Resource Implications	Comments

Appendix 1

Is the policy/savings proposal/restructure/transformation decision likely to breach equalities duties below? If the proposal/policy is not remote or peripheral to the substance of the duties set out below then an Equality Analysis is relevant.

Overview of Equality Act 2010 General Public Sector Equalities duties

Equality Act 2010 – Section 149, Part 11, Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to-

- a) Eliminate discrimination, harassment, victimisation and eliminate any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and person who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercises of those functions, have due regard to the matters mentioned in subsection (1) above.

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to-

- a. remove or minimise disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic;
- b. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c. encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between person who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- a. Tackle prejudice, and
- b. Promote understanding.

Compliance with the duties in this section may involve treating some persons more favourably than other; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

The relevant protected characteristics are:

- a. Age;
- b. Disability;
- c. Gender reassignment;
- d. Pregnancy and maternity;
- e. Race;
- f. Religion or belief;
- g. Sex;
- h. Sexual orientation.

Equality Act 2010 - Section 20, Part 2 - Duty to make adjustments for disabled people

1. Where a provision, criterion or practice of a public body puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
2. Where a physical feature puts a disabled person at a substantial disadvantage in relation matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
3. Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

Under Section 39, Part 5 of the Equality Act 2010, Employers must not discriminate against or victimise an employee:

- as to the terms of employment;
- in the way they make access to opportunities for promotion, transfer or training or for receiving any other benefit, facility or service;
- by dismissing the employee; or subjecting them to any other detriment;
- Employers must ensure that they do not deny workers access to benefits because of a protected characteristic.
- Where denying access to a benefit or offering it on less favourable terms the employer must be able to objectively justify the rule or practice as a proportionate means of achieving a legitimate aim.

Sections 64 and 65 relate to equal pay between men and women.

- These equal pay provisions apply to all contractual terms including wages and salaries, non-discretionary bonuses, holiday pay, sick pay, overtime, shift payments, and occupational pension benefits, and to non-monetary terms such as leave entitlements or access to benefits.
- Other sex discrimination provisions apply to non-contractual pay and benefits such as purely discretionary bonuses, promotions, transfers and training and offers of employment or appointments to office.

Appendix 2

Human Rights Act 1998 which came into force in 2000

Does your proposal breach any of these Articles:

Article 2 - Right to Life

Article 3 - Protection from torture and inhuman or degrading treatment or punishment

Article 4 - Protection from slavery and forced or compulsory labour

Article 5 - The right to liberty and security of person

Article 6 - The right to a fair trial

Article 7 - Protection from retrospective criminal offences

Article 8 - The protection of private and family life

Article 9 - Freedom of thought, conscience and religion

Article 10 - Freedom of expression

Article 11 - Freedom of association and assembly

Article 12 - The right to marry and found a family

Article 14 - Freedom from discrimination

For more information contact:

Celia Golden – Head of Equality, Diversity and Inclusion – People, Equality and Organisational Development - 0208 583 2530 - celia.golden@hounslow.gov.uk

Revised April 2024