

Full Equality Impact Analysis Template – Introduction

This **Full EqIA Template** should be read in conjunction with the [EqIA Guidance Document](#) which supports completion of all EqIA related documentation.

A separate [Initial Scoping Screening Template](#) is also available. This can be used to determine whether a full EqIA is necessary, as this may be unclear initially.

Conducting an Equality Impact Assessment (EqIA)

We use an Equality Impact Assessment (EqIA) to help us determine whether our policies, processes or procedures will affect equality outcomes for different groups of service users or communities (where the proposed activity is related to service delivery or the exercise of our functions) OR impact on different groups of employees (where the proposed activity is employment related). It helps assess whether the impacts will be positive, negative, or unlikely to have a significant impact on each protected characteristic¹ group.

The core purpose of carrying out an EqIA is therefore to:

- a) **analyse a proposed activity** i.e., policy/ strategy/ process/ function / service/ restructure/ programme etc (hereafter referred to as *proposed activity*) against the three specific requirements of the Duty (above) and
- b) **use the outcomes of that analysis** to inform further decision/s and action aimed as mitigating potential adverse impacts, or else to provide clear justification for continuing with a proposed course of action.

The Public Sector Equality Duty (PSED) states that a public authority **must**, in the exercise of its functions, have due regard to the need to:

1. **Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under this Act.**
2. **Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.**
3. **Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

¹ People who share one (or more) of 9 *protected characteristics* (PCs) are protected from unlawful discrimination, victimisation, and harassment under the Equality Act (2010). These groups are referred to as 'protected characteristic groups' in this and related documentation. The 9 PCs are: Age; Disability; Ethnicity; Gender re-assignment; Marriage & Civil Partnership; Pregnancy& Maternity; Religion/ belief; Sex; Sexual orientation.

Using this Full EqlA Template to consider the potential impact of our proposed activity will assist with the Council's compliance with PSED requirements **and** help to avoid or mitigate / minimise adverse impacts on certain groups.

When you need to complete an EqlA

- Key Decision Reports (KDRs) MUST always have either an initial screening assessment OR a full EqlA completed. The EqlA must be signed off by Head of Service and Lead Member and be submitted alongside the KDR for approval and scrutiny. Any equalities issues should be fully addressed and cross referenced as appropriate in the Report
- Budget proposals MUST always have either an initial screening assessment OR a full EqlA, which must be signed off by Head of Service
- Policy changes. When there is a new policy being developed, substantial revisions to existing policy or when there is a minor policy change which may have major impacts on a particular group of service users or employees. This must be signed off by Head of Service
- Service changes. When there is a new service or when there is a service review (including the decommissioning of a service). The assessment should also be carried out when there is a minor change to the service which may have a major impact on a particular group of service users or employees. This must be signed off by Head of Service

General points

The following principles should be borne in mind when conducting an EqlA

- **Timeliness:** the duty to assess potential impacts **applies at the time of considering proposals** and **before** a final decision is taken.
- **Consideration:** the duty to assess and consider must be an integral and rigorous part of your decision-making and influence the process.
- **Initial Screening:** a full EqlA is not always necessary, but this may not be immediately obvious. Use the [Initial Screening Scoping Template](#) if you are unsure, to help you determine what level of assessment is needed. The initial scoping must still be recorded as evidence of 'due regard'.
- **Sufficient Information:** we must evaluate what information we have and think about what additional data/information might be needed to give proper consideration.
- **Review:** The Equality Duty is a 'continuing duty'. This means it continues to apply **after** proposals are implemented/reviewed. Monitoring is key.
- **Record Keeping:** we must keep records of the EqlA process, any impacts identified and what we plan to do as a result.

Failure to fully consider the above when conducting an EqlA (and in any decision based on that), may leave the Council open to legal challenge, cause considerable delay and lead to financial and/or reputational damage

If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the relevant ED&I Officer/ Lead for support and advice (see below).

Further advice and guidance **should** be accessed from the separate [EQIA Guidance Document](#) our ED&I Leads as well as from your service area [Diversity Champions](#):

RBKC

For external facing EqlAs: Corporate Equalities Officer: angela.chaudhry@rbkc.gov.uk

For internal facing EqIAs: Strategic ED&I Lead (HR): amanda.rice@rbkc.gov.uk or charlaine.nkum@rbkc.gov.uk

Equality Impact Analysis Template

Section 01: Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2023 Q2
Name & details of proposed activity (i.e., the policy/ strategy/ process/ function / service/ restructure/ programme etc) to be assessed - hereafter referred to as ' <i>proposed activity</i> '	Earl's Court Opportunity Area Placemaking Framework Supplementary Planning Document (SPD)
Lead Officers (i.e., those responsible for /managing the proposed activity)	Name: Nadia Robinson / Ximena Aguirre Position: Senior Planning Projects Officer / Senior Urban Design Officer
Single or BI-Borough	Single
Date of completion of final Full EqIA	23/03/2023
Section 02	Scoping of Full EqIA
Plan for completion	Timing: Resources:

Analyse the impact of the proposed activity

At the start of the engagement process for this project, the 2011 census data was the most recent available. During the production of the document, the 2021 census data became available and the breakdown by ward is being carried out. The EqIA will therefore be reviewed once the ward data becomes available.

Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
Age	<p>RBKC</p> <ul style="list-style-type: none"> - In 2011 11.5% of residents were aged less than 16, 79.8 per cent between 16-64 (of working age) which was higher than the K&C average and 8.8 per cent are aged over 65 (i.e. of pensionable age). <p>The document in 1.3a) places a requirement on a scheme to provide open space of sufficient and varying scales to allow for a range of people and activities outdoors including intergenerational mixing.</p> <p>The document in 1.3b) requires the public realm to feel inclusive for all, taking particular account of children, teenagers, girls and women. Active measures including how the space is managed and activities to invite people in should be included. This is to ensure all sectors of the community feel comfortable in the public realm and open spaces. Paying specific attention to those particular groups can have the impact of making the public realm more accessible and inclusive for all.</p> <p>The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Positive
Disability	<p>RBKC</p> <ul style="list-style-type: none"> - In 2011 13.1% of Earl's Court residents have a long-term limiting illness. 	Positive

		<p>The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p> <p>The redevelopment of the site would need to meet standards of accessibility outlined in Building Regulations Approved Document M and therefore would provide improved standards of access compared with existing, older buildings in the area including homes.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	
	Gender reassignment	<p>RBKC</p> <p>The document in 1.3b) requires the public realm to feel inclusive for all, taking particular account of children, teenagers, girls and women. Active measures including how the space is managed and activities to invite people in should be included. This is to ensure all sectors of the community feel comfortable in the public realm and open spaces. Paying specific attention to those particular groups can have the impact of making the public realm more accessible and inclusive for all.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Positive
	Marriage and Civil Partnership	<p>RBKC</p> <p>The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p>	Positive
	Pregnancy and maternity	<p>RBKC</p>	Positive

		<p>The document in 1.3b) requires the public realm to feel inclusive for all, taking particular account of children, teenagers, girls and women. Active measures including how the space is managed and activities to invite people in should be included. This is to ensure all sectors of the community feel comfortable in the public realm and open spaces. Paying specific attention to those particular groups can have the impact of making the public realm more accessible and inclusive for all.</p> <p>The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>																			
	Race	<p>RBKC Earl's Court ethnic groups</p> <table border="1" data-bbox="772 786 1700 1002"> <thead> <tr> <th>Broad ethnic group</th> <th>Earl's Court 2011 (%)</th> <th>RBKC 2011 (%)</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>64.6</td> <td>70.6</td> </tr> <tr> <td>Mixed</td> <td>5.7</td> <td>5.7</td> </tr> <tr> <td>Asian/ Asian British</td> <td>16.2</td> <td>10</td> </tr> <tr> <td>Black/ Black British</td> <td>5.1</td> <td>6.6</td> </tr> <tr> <td>Other ethnic group</td> <td>8.4</td> <td>7.2</td> </tr> </tbody> </table> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Broad ethnic group	Earl's Court 2011 (%)	RBKC 2011 (%)	White	64.6	70.6	Mixed	5.7	5.7	Asian/ Asian British	16.2	10	Black/ Black British	5.1	6.6	Other ethnic group	8.4	7.2	Positive
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	Religion/belief (including non-belief)	<p>RBKC The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different</p>	Positive																		

		<p>types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	
	Sex	<p>RBKC</p> <p>The document in 1.3b) requires the public realm to feel inclusive for all, taking particular account of children, teenagers, girls and women. Active measures including how the space is managed and activities to invite people in should be included. This is to ensure all sectors of the community feel comfortable in the public realm and open spaces. Paying specific attention to those particular groups can have the impact of making the public realm more accessible and inclusive for all.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Positive
	Sexual Orientation	<p>RBKC</p> <p>The document highlights that the area was well known as a LGBTQ+ destination in the 1970s and 1980s, noting that this history remains familiar and important, especially to local people. This inclusive character of Earl's Court is something that should be continued as the development adds to the wider neighbourhood.</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Positive

The following groups are not specifically protected by the Equality Act, but RBKC considers them as part of our broader approach to supporting equal outcomes for communities that may be disadvantaged, marginalised, or excluded. Please consider whether they may be impacted.

Socio-economic	<p>RBKC</p> <p>The document in 4.1d) encourages a mix, distribution, quantum and phasing of community housing tenures that contribute to establishing a community that is balanced and mixed.</p> <p>The document in 4.1e) requires the design of homes and their energy use to deliver significant benefits for residents as compared with living in another new development or in older housing stock. This should include energy costs, comfort of the internal environment especially in extreme weather, and accessibility of data to inform choices.</p> <p>The document in 4.2d) requires any affordable workspace on the site to be designed to meet the needs of local people, local organisations and to complement the wider commercial and cultural strategy for the site. This is to ensure the workspace offered at affordable rates is suitable for local organisations including creative and performance groups.</p>	Positive
Geographical	<p>RBKC</p> <p>The document in 4.2e) requires measures to be identified that will ensure the development is inclusive and feels welcoming to and comfortable for all. Measures may include programming of events, familiar urban typologies such as streets, and indoor or covered public space. This is to avoid people feeling uncertain as to whether they belong in the development and to ensure the public realm is inviting for and used by all, generating a sense of inclusion appropriate for a city.</p>	Neutral
Carers	<p>RBKC</p> <p>The document in 4.1b) requires homes to be designed to be adaptable so that the same property can be used by the same household at different life stages and by different types of households, such as sharers and families. This is to provide a choice of housing and cater for a range of lifestyles.</p>	Neutral
Other relevant groups:	<p>RBKC</p> <p>No other groups have been identified.</p>	

	Human Rights & Children's Rights
	<p>Does your proposal impact on Human Rights as defined by the Human Rights Act 1998? (See guidance for more information on this)</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <hr/> <p>Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

Section 03	Analysis of relevant data Examples of data include census data; customer satisfaction surveys; customer complaints data workforce demographic data. Data should involve specialist data and information and, where possible, should be disaggregated by different protected characteristics.
Documents and data reviewed	<p>National Planning Policy Framework, Planning Practice Guidance, London Plan (2021), Local Plan (2019), New Local Plan Review, Previous RBKC consultation responses in relation to Earl's Court, census data* (2011)</p> <p>*at the time of completing this EQIA updated ward profiles based on the 2021 census had not been released</p> <ul style="list-style-type: none"> - Earl's Court has the second highest population density in the borough of 198 people per hectare.
Additional research	<p>Further community engagement was carried out to inform this document. To ensure that there was a diversity of views, the project team spoke to groups that are usually represented, such as residents' associations, as well as conducting semi-structured interviews with individuals representing a set of target demographics. Each individual represented one or more of the following social characteristics:</p> <ul style="list-style-type: none"> • social housing tenants • older people • people with special needs • young people • English as a second language • charity worker • hotel owner • retail owner • local creative/artist

Section 04	Consultation
	Complete this section if you have decided to supplement existing data by carrying out additional consultation with a) service users/local community groups b) employees
Consultation	<p>The priorities, principles and criteria that make up the Placemaking Framework SPD developed from the key findings from the community engagement. These were then refined after consideration of the comments received in response to the formal consultation.</p> <p>Early engagement – May to October 2022 The purpose of the early phase of community engagement was to:</p> <ul style="list-style-type: none"> • gather in-depth feedback about Earl’s Court and practical ideas for the Opportunity Area from groups and individuals very familiar with the neighbourhood, • discuss initial assumptions stemming from previous consultations, and • feed the findings into a draft of the placemaking framework. <p>To ensure that there was a diversity of views, the project team spoke to groups that are usually represented, such as residents’ associations, as well as conducting semi-structured interviews with individuals representing a set of target demographics. Each individual represented one or more of the following social characteristics: social housing tenant, older people, people with special needs, young people, English as a second language, charity worker, hotel owner, retail owner, and local creative/artist.</p> <p>Overall, 16 local organisations took part in the early engagement phase including residents’ associations, charities (supporting low income school children, families, migrants and refugees), artists, a local primary school, and local businesses, as well as ward councillors.</p> <p>Formal consultation – 27 October to 22 December 2022 At the formal consultation stage, the pool of consultees expanded to include a local faith organisation, arts organisation, amenity group, as well as additional residents. The Council received 27 written responses to the consultation in addition to responses captured at an exhibition event in November 2022. The 27 responses are broken down as follows:</p> <ul style="list-style-type: none"> • 9 Residents/individuals • 3 Local organisations • 3 Ward members • 3 Residents’ Associations • 8 Statutory bodies • 1 Developer
Analysis and Outcomes of consultation	<p>Include information here on the analysis of consultation outcomes within both boroughs (if a bi-borough EqIA)</p> <p>Two of the key findings of the early engagement were that the new development (the subject of the Placemaking Framework) should integrate with the rest of the neighbourhood of Earl’s Court, including through community, and that Earl’s Court is and should remain eclectic and multicultural. These findings have informed many of the principles that relate to the public realm,</p>

	<p>community facilities and housing options and affordability that are included in the Framework, which will in turn guide the development of a scheme on the site:</p> <ul style="list-style-type: none"> 1.3a) Generous open space 1.3b) Inclusive public realm 1.3c) Open space for the community 4.1a) A choice of homes 4.1b) Adaptable homes 4.1d) Community housing 4.1e) Benefits of sustainability for residents 4.2e) Inclusive <p>There is an emphasis through the document on inclusion in order to deliver positive impacts on all protected characteristics, for example in the choice and adaptability of homes, and in feeling physically and socially included in the public realm. The developer is expected to demonstrate how their scheme responds to each of the criteria in the Framework to deliver the benefits required by the Council.</p>
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Section 05	Action Plan					
	At this point we have the information needed, and there will be continuous review of how the emerging scheme proposed by the developer meets the criteria in the Framework.					
	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan

Section 06	
Director/ Head of Service sign-off	Name: Amanda Reid Position: Director of Planning and Place
Key Decision Report (If relevant)	Name of Lead/ Cabinet Member: Cllr Cem Kemahli Date of report to Leadership Team: 12/04/2023 The equality implications section has been completed within the KDR and the EqIA is ready to be submitted alongside it: Yes
Lead ED&I Officer (where involved)	Name: Mandeep Kaur Baines Position: Corporate EDI lead Date advice / guidance given: 23/03/2023

Review Date/s Recommended at: 3 months; 6 months and 12 months	<p>1st Review: When ward data breakdown of 2021 Census is available</p> <p>2nd Review: n/a</p> <p>3rd Review: n/a</p>
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