

Equality Impact Analysis Template

Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service, or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users¹.

EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people². EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010³.

This template sets out the steps you need to take to complete an EqIA for your project. Guidance for sections is in the end-notes. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

Title of Project/Service/Policy⁴	Hastings Town Centre Public Realm and Green Connections
Team/Department⁵	Major Projects & Growth
Directorate	Communities, Economy and Transport
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope⁶	<p>As part of the Hastings Town Deal, the Hastings Town Centre Public Realm and Green Connections project looks to improve connectivity within the town centre, prioritise active travel and increase greening and biodiversity.</p> <p>The project was first approved by DLUHC in 2022 with a budget of £3m. Following a subsequent business case in 2023 this was increased to £9.7m funded until March 2026, with an additional £400k of LGF match funding. (1).</p> <p>In line with the project objectives, the design aims to put people and nature first. A carefully considered movement strategy prioritises pedestrian and cycle movement through the site, considering the arrival sequence of those entering the area from multiple points and using</p>

multiple modes of transport. The planting design will be functional, evoking unique landscape characters and providing seasonal interest whilst contributing to storm-water management and the resilience of the town centre [\(2\)](#).

The Public Realm and Green Connections project will be a significant step towards Hastings' ambition to become the South East's first green Garden Town [\(3\)](#).

The project framework key moves are:

- 1) Arrival experience: Improvements to the train station forecourt, as a primary gateway, would enhance the experience of those arriving in the town by rail.
- 2) Station to Sea: Prioritising active travel and connecting the train station to sea would facilitate permeable movement through the heart of the town to the coast.
- 3) Town to Castle: Improving east-west movement across the town and introducing additional planting would establish a corridor between White Rock, the Castle and the Old Town beyond.
- 4) Improve Public Spaces for Local People: Hastings has an expansive network of pedestrian areas and public spaces. Improving the multifunctionality of these spaces would support increased animation, vibrancy and the overall quality of the townscape.
- 5) Bringing Nature into the Town: There is a critical need to bring nature into the town. A coherent green infrastructure network should be established to connect existing sites, improve biodiversity, contribute to the health and wellbeing of people in the town and support improvements to the public realm.
- 6) Improve Junctions: To tackle issues of severance caused by major vehicular thoroughfares around the town centre, improved pedestrian and cycle crossings should be considered to dovetail proposals in the town centre with spaces beyond.

[\(4\)](#)

	<p>The project's policy context aimed to embed concepts drawn from relevant strategic and policy documents listed below and which all had their own equality considerations via assessments and stakeholder engagement (3):</p> <p>Local Cycling and Walking Infrastructure Plan (LCWIP) Hastings Greenway Project Biodiversity Action Plan (BAP) (3).</p> <p>Hastings Planning Strategy (2014) Hastings Local Plan Consultation Draft (2021) Hastings Biodiversity Action Plan Hastings Town Centre and Bohemia Area Action Plan (2018) Hastings Town Centre and White Rock Retail and Leisure Assessment and Urban Design Analysis (2016) Hastings Greenway Group Walking and Cycling Strategy (2014) Hastings Strategic Open Space and Play Space Assessment (2020) East Sussex Local Cycling and Walking Infrastructure Plan (2020) East Sussex Bus Improvement Plan (2021) Trinity Triangle Hastings - Heritage Action Zone (3)</p> <p>We are taking our proposals to public consultation over 6 weeks, between 22nd of January 2024 and 1st March. There will be 2 in person, public events on Saturday 27th January and Tuesday 6th February. We will also hold stakeholder workshops on 24th of January and 1st of February specifically for access and voluntary groups, greening and community groups and the business community.</p> <p>At this stage the EqIA only covers the design proposals. As the project develops the EqIA will be reviewed and updated to reflect any changes and the implementation phases.</p>
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Initial assessment of whether your project requires an EqIA

When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	Yes		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	Yes		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	Yes		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?	Yes		
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents ?	Yes		
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?		No	
7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?	Yes		

If you have answered “YES” or “DON'T KNOW” to any of the questions above, then the completion of an EqIA is necessary.

The need for an EqIA will depend on:

- How many questions you have answered “yes”, or “don't know” to;

- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
	x	

1. Update on previous EqlAs and outcomes of previous actions (if applicable)⁷

What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
Not applicable: this is the first plan of this sort.		

2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

Protected characteristics groups under the Equality Act 2010	What do you know ⁸ ? Summary of data about your service-users and/or staff	What do people tell you ⁹ ? Summary of service-user and/or staff feedback	What does this mean ¹⁰ ? Impacts identified from data and feedback (actual and potential)	What can you do ¹¹ ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹²	<p>All figures are based on the 2021 census.</p> <p>Hastings is ageing with its' population median age increased from 14 to 43 years between the 2011 and 2021 census. Its median age is higher than the South East (41) and England's average (40). It saw an increase of 30% on residents aged between 65 and 74 years while the age group between 35 and 49 years decreased 11.3%. (6) (7)</p> <p>65 and over Hastings (20.2%) has is the lowest percentage of people 65 and over in East Sussex (26.1%) although higher than</p>	Will analyse feedback from consultation.	<p>Potentially all age groups who study, live, work, or visit Hastings' town centre will benefit from the scheme given the proposals submitted.</p> <p>The framework key moves provide access for local communities to healthcare, education, retail and leisure uses as well as providing access to the seafront area in Hastings. It is also important for supporting the delivery of potential new housing, growth in the local economy and access to jobs, all of which have benefits for people of different ages.</p> <p>Older and younger people can be at more risk from accidents.</p> <p>The scheme's proposal to close and/or restricting general traffic on roads within</p>	<p>Actively target older, younger and population groups during the consultation period. Provide alternative means for older people to engage with the consultation process.</p> <p>Approach key organisations that work with and/or represent older and young people as well as working age people.</p> <p>Maintain clear communication throughout consultation and moving into next design stage – not just</p>

	<p>the South East (19.4%) and national (18.4%) rates.</p> <p>15 to 64 Hastings (63%) is the highest percentage of people aged between 15 and 64 in East Sussex (58.5%), although slightly below the South East (63.1%) and national (64.2%) rates.</p> <p>0 to 14 Hastings (16.8%) is the highest percentage of people aged between 0 and 14 in East Sussex (15.4%), although below the South East (17.4%) and national (17.4%) rates. (5)</p> <p>Projections across East Sussex estimate an ageing population due to internal migration of adults and older people into the area. (6) (7)</p>		<p>the scheme has the potential to reduce the current level of collisions, reduce air pollution and promote active lifestyles with cycle lanes and improved green infrastructure network.</p> <p>Passengers on the bus services in the proposed scheme locations are likely to be older, particularly during inter-peak times.</p> <p>Older passengers may find it confusing if bus stops are relocated.</p> <p>Older people may be more at risk when using shared pedestrian/cycle ways, so the current design proposals include a segregated cycle path.</p> <p>Older passengers may have safety concerns when traveling late at night or in winter. There may also be concerns about anti-social behaviour. The new designs aim to improve the experience and perception of the safety of local spaces and transport.</p> <p>Older passengers will benefit from reduced journey times and greater bus reliability due to bus only routes.</p> <p>Older car drivers may be concerned about the reallocation of road space on</p>	<p>relying on online platforms.</p> <p>A full safety assessment will be carried out on all proposed routes that are taken through to the next design stage.</p> <p>Hastings Borough do not currently intend to reopen the Harold Place toilet block, so the removal does not restrict access further than existing. Potential to work with Hastings Borough on clear wayfinding to nearest available public toilets.</p>
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			<p>some of the schemes and what this might mean for them.</p> <p>This scheme proposes to remove the closed toilet block at Harold Place, which means older people may continue to feel limited in their use of this public spaces due to lack of access to public toilets.</p> <p>Young people are more likely to be reliant on public transport, and more likely to have concerns about fares and bus reliability.</p>	
Disability ¹³	<p>All figures are based on the 2021 census.</p> <p>In East Sussex, the number of residents who identify as disabled is 20.3% - Census 2021.</p> <p>In Hastings over 20% of residents identify as disabled (whether limited a lot or a little)</p> <p>The 2021 Census is the latest comprehensive data we have on the number of people with a disability in the county. Our local projections suggest that</p>	Will analyse feedback from consultation.	<p>Collectively the proposed schemes are aimed at reducing general traffic on the roads and thus reducing vehicle emissions. This will have great health benefits for all but especially those with long-term respiratory conditions.</p> <p>Those with disabilities (including physical, learning disability and mental health) may have concerns about safety travelling from, to and at town centre, for example walking or using and accessing public transport.</p> <p>The scheme proposes improvements including access, signage and street furniture that will work for everyone such as seating with back and</p>	<p>Reach out to groups and representatives during the consultation period.</p> <p>Ensure that proposed designs are tested for accessibility and safety as we move through to the next design stage.</p>

	<p>by 2032 there will be over 130,000 people with a disability in East Sussex of which 22,968 are projected to Hastings. (6) (9)</p> <p>National data shows that disabled people are more likely to be injured as a pedestrian than no-disabled people (8)</p>		<p>armrests, with various heights and positioned at accessible points. Street clutter will be reduced, which improves access for blind and visually impaired people.</p> <p>Disabled people or with limited mobility will benefit from a town centre with limited general traffic and open wide spaces that prioritises people and nature.</p> <p>Disabled car drivers may be concerned about the reallocation of road space on some of the schemes and what this might mean for them.</p> <p>Those with disabilities (especially blind, visually impaired and deaf people) may be more at risk when using shared use pedestrian/cycle ways. The current design proposals include a segregated cycle path, and signage and access will be considered as the designs progress.</p> <p>Increasing safe junctions and crossings will assist disabled people to keep safe and maintain independence when travelling by foot or in wheelchairs/scooters.</p> <p>Materials and hard surfacing will be selected to ensure good visual and tactile clues for people with limited</p>	
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			vision. Clear colour contrasts will be used to identify different areas and uses.	
Gender reassignment¹⁴	<p>0.5% of people from Hastings responding in the Census 2021 indicated that their gender identity was different from their sex registered at birth. Nevertheless, a significant percentage of people across the county provided no response, therefore the percentage of people with a different gender identity to their sex registered at birth could be either higher or lower than shown (7).</p> <p>ONS MSOA's data shows that in Hastings 383 people stated to have a gender identity different from sex registered at birth (5).</p> <p>The National LGBT survey (2018) highlighted that Transgender people have the lowest average life satisfaction in UK (5.5 to 5.1) compared to the national average (7.7), it also confirmed that transgender people are a</p>	Will analyse feedback from consultation.	Transgender people may benefit from non-sex-segregated public spaces that are people friendly with wide well lit open spaces. Improved green infrastructure can improve overall wellbeing and can also reduce general anti-social behaviour. It also has the potential to allow transgender people to navigate the dichotomy of visibility and invisibility as a management technique for potential vulnerability in public spaces. With this approach, the proposed schemes have the potential to improve perceived and actual safety. (12)	<p>Make the safety benefits clear when communicating about the schemes proposals.</p> <p>Reach out to groups and representatives during the consultation period. (13)</p>

	<p>target for abuse, harassment and anti-social behaviour which can raise concerns regarding their safety in public spaces. “59% of trans women and 56% of trans men who responded to the survey said they had avoided expressing their gender identity for fear of a negative reaction from others.” (10)</p> <p>“Transgender people are more likely to experience threats of physical or sexual harassment or violence compared with the LGBT community as a whole (National LGBT Survey, Government Equalities Office).” (11)</p>			
Pregnancy and maternity¹⁵	<p>According to ONS data, Hastings had 909 live births in 2021 and a rate of 15 births per 1,000 females in 2020 (7).</p> <p>The trend is a clear decline since the Census in 2011 when there were 1,202 live births in Hastings (5).</p>	Will analyse feedback from consultation.	<p>Pregnant people and those on maternity will greatly benefit from family friendly spaces, reduction of general traffic and green infrastructure.</p> <p>Improvements junctions and pedestrian crossings will make it safer for those with pushchairs and small children.</p>	Make the social benefits clear when communicating about the schemes’ proposals.

<p>Race (ethnicity)¹⁶ Including migrants, refugees and asylum seekers</p>	<p>89.3% in 2011 Censuses and 85.1% in 2021 Census identified as “white British and Northern Irish”, which meant an increase of ethnic minority groups in Hastings⁽⁵⁾.</p> <p>The ESCC Schools Census from January 2023 shows that Hastings had 20% of ethnic minority students in primary schools and 16% in secondary schools.</p> <p>Sussex police recorded 1512 racially or religiously aggravated offences in the 2022 and 2023 year across the South East Region and 467 for the current year ⁽¹⁴⁾.</p> <p>The Home Office and the Department for Levelling Up, Housing & Communities Immigration System Statistics data published in May 2023 shows that Hastings has 262 refugees from the Homes for Ukraine, Afghan Resettlement Programme and other Supported Asylum programme, 0.29% of Hastings total population ⁽¹⁵⁾.</p>	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	<p>Safety for those who identify as black or ethnic minorities may have perceived and actual risks using public spaces and when travelling on public transport. The scheme looks to improve safety by considering street lighting and other public realm improvements.</p> <p>Also, possibly some issues for people with English as an additional language, or new arrivals to the UK (although these numbers are relatively small - but growing) when navigating public transport.</p>	<p>Make the social benefits clear when communicating about the schemes’ proposals.</p>
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	National data analysis by specific ethnic groups has revealed that there is large variation in collision risk between different ethnic minority communities, potentially linked to car ownership (16)			
Religion or belief¹⁷	In the 2021 Census 51.4% of Hastings residents stated that they had no religion. Of those with a religion, 37.8% were Christians, 1.9% Muslim, 0.9% Other, 0.6% Buddhist, 0.5% Hindu and 0.2% Jewish (6) .	No feedback received currently. Will analyse feedback from consultation.	Safety concerns perceived and actual risks of hate crime especially for religious minority groups is a key concern. The scheme looks to improve safety by considering street lighting and other public realm improvements.	Make the safety benefits clear when communicating about the proposals.
Sex¹⁸	In 2021 Census 51.5% of Hastings population was female, an increase from 48.8% in 2011 Census (5) . With Hastings Town Hall in an adjacent area to the schemes' proposals, it's relevant to include Hastings council workforce gender constitution since 55% are female but only 35% work full time as per data release for 2023 (17) .	Will analyse feedback from consultation.	Women are more likely to have caring responsibilities which could mean a higher use during the day of the areas within the schemes and bring those in their care to the area such as children and older people. They are also more likely to make multiple short journeys or 'chain-journeys' during a day, (for example to drop children off at school, visit an elderly parent and shop for food). This can bounce them out of 'usual' commuting routes.	Seek opportunities for women to feedback on the proposed schemes consultation. Offer alternative options for providing feedback and be mindful of certain times (e.g. school pick up time) where women are more likely to have caring responsibilities. Make the safety benefits clear when communicating about the proposals.

	The percentage of women (51.8% is slightly higher in East Sussex than the national average and consequently the number of men (48.1%) is slightly lower. Data from 2011 Census (5) .		Women are most likely to be the victims of sexual harassment and sexual abuse on public spaces and transport. Safety when walking or using public transport is a key concern.	
Sexual orientation¹⁹	<p>The 2021 Census indicates that 3.3% of people 16 years and older from the East Sussex identify as Lesbian, Gay, Bisexual or Other (LGB+) and in Hastings 4.6% (7).</p> <p>The National LGBT survey (2018) highlighted both perceived and real risks of hate crime targeting the LGB+ communities (10).</p>	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	Safety concerns perceived and actual risks of hate crime especially for those identifying as LGBTQ+ is a key concern. The scheme looks to improve safety by considering street lighting and other public realm improvements.	Make the safety benefits clear when communicating about the proposals.
Marriage and civil partnership²⁰	Hastings latest data for marital status is from the 2021 Census. 39.6% of respondents were single, 38.4% were married or in a civil partnership. 12.7% of respondents were divorced, 2.9% separated and 6.3% were widowed (5) .	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.

<p>Armed Forces²¹</p>	<p>Based on the 2021 Census, 2,914 people in Hastings reported that they served as regular or reserve in UK armed forces which is 3.9% of Hastings usual residents aged 16 years and over, the lowest percentage within East Sussex District Councils (5).</p>	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	<p>It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.</p>	<p>It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.</p>
<p>Impacts on community cohesion²²</p>	<p>Hastings Community Cohesion Framework 2011 – 2013 states that “A significant barrier to community cohesion is poor knowledge and understanding of one another and of different ways of life, which can lead to prejudice and discrimination” (18).</p> <p>Although the document refers to a context from over 10 years ago, parts of it remain relevant such as key factors such as reduced public sector spending, to current inflation and cost of living crisis can “exacerbate already existing problems of high levels of deprivation” (18).</p>	<p>No feedback received.</p>	<p>Although it is not considered that there will be any disproportionate, negative impact on community cohesion by the scheme, the project’s objectives and the design aims to put people and nature first may facilitate the building of social capital referred to on Hastings Community Cohesion Framework 2011 – 2013 and aligned with its mission: “To build on the town’s strong community spirit, culture, diverse population and extraordinary natural environment to create a safer, healthier more sustainable and more prosperous place with lasting opportunities for everybody” (18).</p> <p>The project may also contribute towards the following 2023-24 Corporate Plan update priorities (20):</p>	<p>it is not considered that there will be any disproportionate, negative impact on community cohesion by the scheme.</p>

	<p>The projects area of direct intervention includes one part of Hastings that is in the 10% most Deprived areas on the Index of Multiple Deprivation (IMD 2019) and another on the second Decile. 57.9% of households in Hastings is deprived in at least one dimension based on the Households by deprivation dimensions in 2021, a percentage higher than East Sussex as a whole (53.1%) and higher than both South East (48%) and the national (51.6%) levels (19) (5).</p>		<ul style="list-style-type: none"> 2 Keeping Hastings clean and safe 3 Minimising our environmental impact 4 Making the best use of our land and buildings 5 Changing how we work to meet the future 6 Delivering responsible regeneration for the town 	
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Additional categories

(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know ²³ ?	What do people tell you ²⁴ ?	What does this mean ²⁵ ?	What can you do ²⁶ ?
Rurality²⁷	The proposed project is located in Hastings; therefore this characteristic is not relevant (21) .			
Carers	<p>“In all 5 districts of East Sussex, there was a smaller proportion of unpaid carers in 2021 compared with 2011. Hastings registered the largest proportion of people aged 5 and over providing 20 or more hours of unpaid care a week: 5.5% (4,780 residents) in 2021, compared with 4.1% (3,730) in 2011.” (22)</p> <p>“At LSOA-level, Hastings 003C once again ranked top, with 15.4% of residents providing some form of unpaid care” (22).</p> <p>Note: Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived and managed their provision of unpaid care, and therefore may have affected how people chose to respond. Caution should also be taken when making comparisons between 2011 and 2021 because of changes in question’s wording (22).</p>	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	<p>Carers, as a vulnerable group due to their role which can lead them to become socially isolated, may benefit from the project’s potential contribution to community cohesion by putting people and nature first when designing and developing public spaces as it may enhance the opportunity to develop social capital’s bonding and bridging within existing and new social networks.</p>	<p>Actively engage with carer groups and representatives during the consultation period to ensure their voices are heard.</p>

<p>Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note)²⁸</p>	<p>Homeless people</p> <p>According to Shelter’s estimate based on DLUHC’s official statutory homelessness statistics, Hastings was the 5th local authority with the highest rate of people who are homeless (living in temporary accommodation or sleeping on the streets (excluding London) (23).</p> <p>A situation exacerbated by cost of living crisis, which according to Hastings Council Leader, “It has gone from 170 people needing temporary accommodation two years ago. Now it is over 1,000 people here. We have more than 1,000 homeless people in a town of 90,000. That’s a massive percentage.” (25) (26)</p> <p>The situation is putting the Hastings Borough Council at risk bankruptcy by March 2024 due to soaring costs because of its growing homelessness problem. (24)</p> <p>Substance misusers</p> <p>“In East Sussex there is a strong correlation between the home addresses of the in-treatment drug population and the areas of highest deprivation. In 2021/22, most people using drug services were living in the urban areas of Hastings (32%) and Eastbourne (27%).” (27)</p>	<p>No feedback received currently.</p> <p>Will analyse feedback from consultation.</p>	<p>Homeless people and substance users, as a vulnerable groups, may benefit from the project’s potential contribution to community cohesion by putting people and nature first when designing and developing public spaces as it may enhance the opportunity to develop social capital’s bonding and bridging within existing and new social networks.</p>	<p>Actively engage with representative voluntary groups during the consultation period to ensure their voices are heard.</p>
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	<p>One of the highest areas (MSOA level) overlaps with the project's main area of intervention, Central Hastings (27).</p> <p>“Office for National Statistic figures show there were 18 drug poisoning deaths in Hastings in 2022 – up from 17 the year before and the highest on record.” (28) (29)</p>			
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Assessment of overall impacts and any further recommendations²⁹ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)

The public consultation period between 22nd of January 2024 and 1st March will be key in better understanding the needs, concerns and preferences on people living and working in Hastings. There will be 2 in person, public events on Saturday 27th January and Tuesday 6th February. We will also hold stakeholder workshops on 24th of January and 1st of February specifically for access and voluntary groups, greening and community groups and the business community.

Answers and the responses given on the proposals will help to shape the next stage of design and influence the final works. Technical consultants ARUP will attend the events, facilitate the workshops, and use software to analyse the data. Their report will be available from Spring 2024.

Ongoing engagement with stakeholder groups representing these specific groups will continue and will also form significant dialogue within the detailed design process, thus making sure that people who share protected characteristics will not experience detrimental or substantial disadvantage.

3. List detailed data and/or community feedback that informed your EqIA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date Accessed	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
(1) 140323 - Hastings Towns Fund Green Connections Phase 2 - Post Gate 1 Assessment	03/01/24		
(2) Hastings Public Realm & Green Connections – Appendix II: Design Strategies	03/01/24		
(3) Hastings Public Realm & Green Connections – Appendix I: Baseline Analysis	03/01/24		
(4) Hastings Public Realm & Green Connections – Summary of RIBA 2 Design Work	03/01/24		
(5) ESiF (eastsussexinfigures.org.uk)	03/01/24		
(6) How life has changed in Hastings: Census 2021 (ons.gov.uk)	03/01/24		
(7) State of the County 2022: Focus on East Sussex	03/01/24		
(8) Supplementing official statistics: self-reported road injuries in the National Travel Survey — UK Data Service	03/01/24		
(9) State of the County 2021 Focus on East Sussex: Appendix 1 Item 5 - Appendix 1 - Focus on East Sussex.pdf	03/01/24	No data on sexuality	Have sourced data elsewhere
(10) National LGBT Survey: Summary report (publishing.service.gov.uk)	03/01/24		
(11) Transgender Hate - Stop Hate UK	03/01/24		
(12) Final Full Manuscript Criminology and Criminal Justice PDF.pdf (bcu.ac.uk)	03/01/24		

(13) Hastings & Rother Rainbow Alliance Trans (HRRAT) – – Gender Identity Research & Education Society – Tranzwiki directory (gires.org.uk)	03/01/24		
(14) Police recorded crime and outcomes open data tables - GOV.UK (www.gov.uk)	03/01/24		
(15) Regional and Local authority data - Immigration groups	03/01/24		
(16) Ethnicity & Road Safety – Agilysis	03/01/24		
(17) The Councils Current Employment Profile (hastings.gov.uk)	03/01/24		
(18) Hastings Community Cohesion Framework 2011 – 2013 Community Cohesion Appdx 2 (31 10 11).doc.pdf (moderngov.co.uk)	03/01/24		
(19) East Sussex – Indices of Deprivation 2019, 2015 and 2010 (Map & Stats) InstantAtlas™ Report (eastsussexinfigures.org.uk)	03/01/24		
(20) Corporate plan 2023-24 Hastings Borough Council	03/01/24		
(21) Publication title: Rural Urban Classification - Output area	03/01/24		
(22) East Sussex 2021 Census Briefing: Health (eastsussexjsna.org.uk)	03/01/24		
(23) At least 271,000 people are homeless in England today - Shelter England	03/01/24		
(24) Finance Peer Challenge: Hastings Borough Council Local Government Association	03/01/24		

(25) Hastings: Increase in homeless due to cost of living says council The Argus	03/01/24		
(26) Homelessness Review 2019 (hastings.gov.uk)	03/01/24		
(27) substance-misuse-aon-august-2022.pdf (eastsussexjsna.org.uk)	03/01/24		
(28) Record number of drug deaths in Hastings last year (sussexexpress.co.uk)	03/01/24		
(29) Deaths related to drug poisoning by local authority, England and Wales - Office for National Statistics (ons.gov.uk)	03/01/24		
Hastings population change, Census 2021 – ONS	03/01/24		
Trans people in the UK (publishing.service.gov.uk)	03/01/24		
Transgender Hate - Stop Hate UK	03/01/24		
Hastings Strategic Open and Play Space Assessment	03/01/24		
Town Centre Public Realm & Green Connections — Hastings Town Deal	03/01/24		
Planning Strategy - 2013-2018 - Low Resolution (hastings.gov.uk)	03/01/24		
Final Full Manuscript Criminology and Criminal Justice PDF.pdf (bcu.ac.uk)	03/01/24		
Hate Crime Statistics CBP-8537.pdf (parliament.uk)	03/01/24		

4. Prioritised Action Plan³⁰

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
Age	<p>Actively target older population groups during the consultation period. Provide alternative means for older people to engage with the consultation process.</p> <p>Actively target younger population groups during the consultation period.</p>	Receive feedback from key stakeholders and the general public.	<p>A high return of completed consultation surveys from those aged 65 and over.</p> <p>A return of completed consultation surveys from those aged 30 and under.</p>	Consultation window: 22 January - 1 March 2024
Disability	Actively engage with disability activist groups and representatives during the consultation period to ensure their voices are heard.	All comments will be investigated further during the detailed design stage of these proposals.	A good return of completed consultation surveys from those identifying as being disabled	
Gender reassignment	Actively engage with transgender activist groups and representatives during the consultation period to ensure their voices are heard.		A good return of completed consultation surveys from those identifying or representing transgender people.	
Religion or belief	Actively engage with religious groups especially those who have places of worship or work places in or near to schemes' proposals.		A good return of completed consultation surveys from those identifying or representing religious groups.	
Sex	Seek opportunities for women to feedback on the proposed schemes consultation. Offer alternative options for providing feedback and be mindful of certain times (e.g. school pick up time) where women are more likely to have caring responsibilities.		At least a 50% return of completed consultation surveys from women.	

	Look more strategically within ESCC at the representation of women's needs within transport planning and infrastructure.			
Carers	Actively target carer groups during the consultation period.		A good return of completed consultation surveys from those identifying as carers.	
Homeless people	Actively engage with relevant voluntary groups during the consultation period to ensure their voices are heard.		A good return of feedback collected at stakeholder workshops from groups representing homeless people.	
Substance misusers	Actively engage with relevant voluntary groups during the consultation period to ensure their voices are heard.		A good return of feedback collected at stakeholder workshops from groups representing substance misusers.	

¹ The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the Council must be aware of the Council's duties under the Equality Act 2010 and ensure they comply with them appropriately in their daily work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral, rigorous part of your decision-making process and influence the process.
- **Sufficient Information:** you must assess what information you have and what is further needed to give proper consideration.
- **No delegation:** the Council is responsible for ensuring that any contracted services, which are provided on its behalf need also to comply with the same legal obligations under the Equality Act of 2010. You need, therefore, to ensure that the relevant contracts make these obligations clear to the supplier. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy or service is developed/agreed, and when it is implemented and reviewed.
- **Proper Record Keeping:** to prove that the Council has fulfilled its legal obligations under the Equality Act you must keep records of the process you follow and the impacts identified.

NB: Filling out this EqIA in itself does not meet the requirements of the Council's equality duty. All the requirements above must be fulfilled, or the EqIA (and any decision based on it) may be open to challenge. An EqIA therefore can provide evidence that the Council has taken practical steps comply with its equality duty and provide a record that to demonstrate that it has done so.

² **Our duties in the Equality Act 2010**

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the actual and potential impact of our activities on people who share any of the legally 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on the nature of your project, who it might affect, those groups' vulnerability, and the seriousness of any potential impacts it might have. We use this EqIA template to gather information and assess the impact of our project in these areas.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce, minimise or eliminate any negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **promote equality of opportunity.** This means the need to:

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- Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
 - **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

³ **EqIAs are always proportionate** to:

- The nature of the service, or scope of the policy/strategy
- The resources involved
- The number of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed service or policy on a protected group (e.g. disabled people), the more thorough and demanding our process must be so that we comply with the Equality Act of 2010.

⁴ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁵ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁶ **Focus of EqIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Analysis (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the service, policy, strategy, practice, or function?
- Who implements, carries out or delivers the service, policy, strategy, practice, or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?

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- Who is affected by the service, policy, strategy, practice, or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
 - What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes, or improvements, are required and what should the benefits be?
 - What do existing or previous reviews of the service, policy, strategy, practice, or function indicate to you?
 - What is the reason for the proposal, or change (financial, service scope, legal requirements, etc)? The Equality Act requires us to make these clear.

⁷ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write 'not applicable'.

⁸ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?⁸
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups / communities?

⁹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act.

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

¹⁰ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that you take decisions and make changes conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so, the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹¹ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to address the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

¹² **Age:** People of all ages

¹³ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis. Carers of disabled people are protected within the Act by association.

¹⁴ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

¹⁵ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁶ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

¹⁷ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

¹⁸ **Sex:** Both men and women are covered under the Act.

¹⁹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²⁰ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²¹ **Armed Forces:** The Armed Forces Act 2021 aims to help prevent service personnel, veterans and their families being disadvantaged when accessing public services. The new duty applies to certain housing, education or healthcare functions, but it is good practice to ensure consideration of impacts on current or former members of the armed forces, as well as their families.

²² **Community Cohesion:** potential impacts on how well people from different communities get on together. The council has a legal duty to foster good relations between groups of people who share different protected characteristics. Some actions or policies may have impacts – or perceived impacts – on how groups see one another or in terms of how the council's resources are seen to be allocated. There may also be opportunities to positively impact on good relations between groups.

²³ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?²³
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?

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- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
 - Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
 - Do any equality objectives already exist? What is current performance like against them?
 - Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?

²⁴ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council’s duties under the Equality Act .

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
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 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

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- ²⁶ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.
- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
 - Be specific and detailed and explain how far these actions are expected to address the negative impacts.
 - If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
 - An EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

²⁷ **Rurality:** deprivation is experienced differently between people living in rural and urban areas. In rural areas issues can include isolation, access to services (eg: GPs, pharmacies, libraries, schools), low income / part-time work, infrequent public transport, high transport costs, lack of affordable housing and higher fuel costs. Deprivation can also be more dispersed and less visible.

²⁸ **Other groups that may be differently affected:** this may vary by services, but examples include: homeless people, substance misusers, people experiencing domestic/sexual violence, looked after children or care leavers, current or former armed forces personnel (or their families), people on the Autistic spectrum etc.

²⁹ **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

³⁰ **Action Planning:** The Council's obligation under the Equality Act of 2010 is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.