

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Planning application for the relocation of the MoL and provision of flexible uses

Date

20.05.2020

What is the Public Sector Equality Duty (PSED)?

[Double click here for more information / Hide](#)

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.

What is an Equality Analysis (EA)? [Double click here for more information / Hide](#)

How to demonstrate compliance [Double click here for more information / Hide](#)

Deciding what needs to be assessed [Double click here for more information / Hide](#)

Role of the assessor [Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA) [Double click here for more information / Hide](#)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage - gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.2 Analyse the evidence - make an assessment of the impact or effects on different equality groups;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis - include the findings from the EA in your report or add as an appendix including the action plan;

2.5. Monitor and review – monitor the delivery of the action plan & ensure that changes arising from the assessment are implemented.

The Proposal *Click and hover over the questions to find more details on what is require*

Assessor name: Gemma Delves

Contact details: 020 7332 1704

1. What is the Proposal?

A planning application for the conversion of the General Market, Poultry Market and Annexe site to a museum (Class D1) and flexible uses (A1, A2, A3, A4, D1, D2, B1)

2. What are the recommendations?

It is likely to be recommended that planning permission be approved.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

Age *Double click here to add impact / Hide*

Check box if NOT applicable ☐

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

Double click here to show borough wide statistics / hide statistics

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on age:

1. The proposed plans – Showing the layout of the buildings and access arrangements.
2. Statement on how the Museum engages the local community with culture - Gives details on the schools engagement programme and well being programmes for older people.
3. The Socio-economics chapter of the ES - sets out the age distribution of the population in the City as part of its assessment of the impact of the schemes job creation on the local demographic.
4. The statement of community involvement - sets out how different groups have been engaged in development of the Museum's offer.

Age

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

The whole development has been designed to incorporate level access wherever possible or provide lifts in order to ensure ease of movement around the site.

The Museum intends to engage people of all ages through its outreach programmes. This includes an intention to engage with 200,000 school children per year across primary, secondary and SEND level in all London Boroughs. Schools in disadvantaged areas and those that do not visit the museum now would be targeted.

The Museum would continue to run initiatives to promote the wellbeing of local communities including volunteering, apprenticeships and creative courses which would in part be targeted at older people living with loneliness.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue its community engagement programmes to ensure that the Museum's offer is relevant to people of all ages.

Disability [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London's population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals

The following documents submitted with the application are relevant in order to assess the impact of the proposal on disability:

1. The proposed plans – Showing the layout of the buildings and access arrangements.
2. Statement on how the Museum engages the local community with culture.
3. Design and Access Statement – sets out how the scheme has been designed to be accessible and inclusive through the way that the buildings are designed.
4. The statement of community involvement - sets out how different groups have been engaged in development of the Museum's offer including the Museum of London Access Panel and the City of London Access Group.

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Accessible parking and public realm improvements need to be delivered through

Disability

The scheme has been designed to incorporate level access wherever possible. Where this would not be possible due to site constraints accessible lifts are provided. Careful consideration has been given to the circulation arrangements within the building.

Accessible parking and public realm improvements would be provided as part of the S278 agreement.

Accessible facilities would be provided including changing places, toilets, accessible cycle parking, seating and a wheelchair store.

Safe evacuation procedures have been developed for people with physical disabilities or impairment.

The new museum would feature an enhanced access programme for people with disabilities. This would include tailored tours, sessions and resources for people living with dementia and families with children with autistic spectrum conditions.

the S278 agreement. The City's Access Officer should be involved in this process. Consideration would need to be given to levels, entrance thresholds, circulation routes, obstacles and materials.

Further design refinements are needed to the toilet facilities in the Museum. Details of which can be controlled by planning condition in order to ensure that they would be accessible.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

Check box if NOT applicable ☐

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on pregnancy and maternity:

1. The proposed plans – Showing the layout of the buildings and access arrangements.
2. The Design and Access Statement

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Pregnancy and Maternity

Level access would be provided wherever possible and where this would not be possible lifts would be provided in order to ensure ease of movement around the site.

The scheme incorporates a number of accessible toilet facilities.

Seating would be provided through the Museum with a choice of heights and some provided with arms and backrests on both sides.

Race [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on race:

1. The Design and Access Statement
2. The Museum's statement on how local communities are engaged with culture
3. The Statement of Community Involvement

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The Museums research shows that many black, Asian and ethnic minorities see museums as 'not for the likes of us'. The Museum would prioritise those less engaged through dedicated community workshops.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue its community engagement programmes.

Race

Religion or Belief [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics – sources include:

The ONS website has a number of data collections on [religion and belief](#), grouped under the theme of religion and identity.

[Religion in England and Wales provides a summary of the Census 2011 by ward level](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on religion or belief:

1. The Design and Access Statement
2. The Statement of Community Involvement
3. The proposed plans
4. The Museums statement on how it engages local communities with culture

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

A prayer room would be located in the Poultry Market.

Separate sex toilet facilities would be provided.

The museum is committed to running engagement programmes in order to ensure that the museum is accessible and relevant to all groups.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The museum should continue with its engagement programmes.

Sex [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sex

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on sex:

1. The Design and Access Statement
2. The Statement of Community Involvement
3. The Museums statement on how it engages local communities with culture

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Separate sex toilet facilities would be provided.

The Museum is committed to engagement with local community groups. For example Octopus FM was a project in partnership with All Change Arts and Culture Mile Learning which involved working with a cohort of vulnerable women not in education, employment or training, to gain radio production skills and create content for a radio station during the Smithfield Street Party.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue to run its community engagement programmes to ensure that the Museum's officer is accessible and relevant to all.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics – suggested sources include:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on sexual orientation and gender reassignment:

Sexual Orientation and Gender Reassignment

1. The Design and Access Statement

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Within the scheme gender neutral toilet facilities would be provided in addition to separate sex facilities.

The Museum is committed to ensuring that it runs engagement programmes in order ensure that the Museum is accessible and relevant to all.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue with its community engagement programmes.

Marriage and Civil Partnership [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics - sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals

Type response here

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

It is not envisaged that there would be an impact.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue with its community engagement programmes.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

The following documents submitted with the planning application are relevant in assessing additional impacts:

1. The Planning Statement

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

The scheme would have an impact on the traders in the Poultry Market. Traders in the East and West markets are concerned about how the scheme would impact on them. Whilst these concerns are of course valid and understood, in terms of The City Corporation's duty under s149 of the Equality Act 2010, the Corporation, are not aware of any impact on traders that would give rise to issues which are additional to those considered above. In particular the City Corporation are not aware of protected characteristics held by any individual traders or shared by the traders as a group. The SMTA have been given the opportunity to provide further information so that any equality impact on the traders that the Corporation might not be aware of can be taken into account, but at the current time, no further information has been provided.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Liaison should continue between the City as land owner and the traders as tenants.

The S278 agreement should include highway alterations that would enable the museum and the East and West markets to function alongside each other.

Construction and demolition logistics and method statements should be secured by condition in order to ensure that the works would not have an undue impact on market function.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

Careful consideration has been given to the design of the buildings in order to ensure that they are physically accessible within the constraints of the existing building. The museum would continue to run engagement programmes so that its offer is engaging and relevant. Conditions, informatives, the S.106 agreement and a S278 agreement would be needed in order to secure equality of opportunity.

The scheme would impact on the Poultry Market traders. Liaison would need to continue between the City as land owner and the traders as tenant in order to agree a compensation/re-location package.

Outcome of analysis - check the one that applies

☐ Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

☒ Outcome 2 applies in this instance

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

☐ Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

☐ Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

G Richards

Name: Gwyn Richards

Date: 25.05.2020