

Introduction


As a local authority, under the Equalities Act 2010, South Cambridgeshire District Council has a legal duty to have due regard to the need to:

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

Equality Impact Assessments (EqIA) provide the framework through which the council considers the potential impacts of its activities and ensures that it meets its legal duty.

Within the EqIA process, each Council policy, strategy, procedure, project or function is considered in relation to its impact across the nine [protected characteristics](#) of equality: age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

The Equality Impact Assessment is advised to be initiated during the process of development of the policy, strategy, procedure, project or function. It is important for the author to consider the equality impacts prior to the proposal being initiated or implemented.

In completing the form, please hover over the  symbol to obtain guidance on answering a question.

When the form is completed, please send an electronic copy to equality.schemes@scambs.gov.uk. Furthermore, if you require any additional support completing the form, please email on the above address.

You are reminded that if there is an impact and you fail to do an EQIA this may put you and the Council in breach of yours and its duty. You need to take responsibility for making sure that this is not the case. Where there is any doubt a Full EqIA is always recommended.

Equality Impact Assessment Complete Form

Section 1: Identifying Details

Officer completing Full EqIA	Clare Gibbons
Team and Service	Sustainable Communities, H&ES
Title of policy, strategy, service, project or function	Faith/community land allocation policy for Northstowe
EqIA start date	29/01/2020
Date of Full EqIA completion	
Date of proposal implementation	March 2020

Section 2: Proposal to be assessed

2.1 Is the proposal a:

- Strategy
- Policy
- Procedure
- Service/Function
- Other – Please Specify

The proposal is policy, but gives rise to a procedure.

2.2 Is the proposal:

- A new proposal
- Reviewing an existing proposal – If so, date last reviewed.
- A change to an existing strategy policy, strategy, procedure project, or function – If so, date last reviewed.

It is a new proposal for the district council, but rests on policy proposals developed for the Cambridges sub-region in an earlier study, completed by the Three Dragons consultancy on the instruction of Cambridgeshire Horizons.

State last reviewed date:

NA

2.4 Will the proposal have any of the following significant affects?

- affecting several stakeholders
- affecting how functions/services are delivered
- affecting the users of a service/function
- addressing needs

The proposal will have significant effect as it has direct effects in terms of equality – it requires the district council to act without prejudice or preference with respect to the interests of faith (and community) groups.

2.5 Please explain your proposal, addressing each of the following questions.

What are the aims?:

The aim of the proposal is to provide a policy for the allocation of faith/community land in the new development of Northstowe (potentially applicable to other growth sites) allowing a mechanism for selection of the group(s) to which land or space secured through s106 agreements may be awarded to a group to develop (as either a freehold or leasehold opportunity).

What are the objectives that will help achieve these aims?:

The objectives are that the process should provide an outcome such that the group selected to be provided with the land/space thus secured should make a positive and on-going contribution to community development in general, in addition to affording the group with the ability to establish a community of faith or interest which serves the needs of adherents to that faith or interest group and be able to achieve delivery of the building/community service within an acceptable timeframe.

What are the main activities that will take place as part of this proposal?:

The main activity is the establishment of a competitive process by which any proposal coming forward from a faith or community group could be legitimately assessed with respect to the aims outlined above.

Which of the Council's business plan priorities does this proposal link to?:

We are a modern and caring council... and make decisions in a transparent, open and inclusive way.

and, *Housing that is truly affordable for everyone to live in* B2 – “we will create thriving communities where people can live, work and play”.


Whose needs is it designed to meet?

It is designed to meet the needs of the community and community groups who are to be the beneficiaries of the land/space to be awarded through the process, such that all groups will be treated in a transparent, open and inclusive way and provide an objective framework which will allow officers to assess applications made by faith/community groups.

How many people will this proposal impact? (Approximately)

This proposal will ultimately impact on the population of Northstowe, some 28,000 people when fully built out and occupied, plus those from the surrounding settlements which will look to Northstowe as a site for employment, service centre and potentially, a place of worship as an expression of their personal faith.


2.6 Does or will the proposal affect:

- Service users (Please specify below)
- Employees of SCDC
- Specific groups (please specify below) 
- External stakeholders (Wider Community, please specify below)
- Other (please specify below)
- No effect on anyone (please specify reason for proposal)

This proposal will affect all those faith groups and community interest groups who have ambitions to establish in Northstowe and the wider community from which they will be drawn and hope to serve. The choice of group selected may also impact on the sense of inclusion felt by members of the Northstowe community – i.e. whether the presence and activity of a particular group could be perceived as restricting their freedoms or diminishing their value as members of society. We must be mindful that faith/community groups who legitimately claim freedom of worship and expression may espouse views that other members of the community may find problematic – the challenge is to find a policy and process which honours one without compromising the other.

2.7 Who will be responsible for carrying out this proposal?

Officers within the Sustainable Communities team (soon to be incorporated into the new Transformation division) will be responsible for implementing this proposal.

2.8 If any part of the proposal is being undertaken by external partners, please specify how SCDC will ensure that they will meet equality standards? 

The process calls for community consultation to form an integral part in the allocation process. This will require community engagement across the entirety of

the Northstowe population, not restricted to the faith/community groups likely to come forward with proposals, although their views may be explicitly sought out. It requires officers of the district council to act with disinterest, demonstrably upholding the seven principles of public life: selflessness, integrity, objectivity, openness, honesty and leadership. This may place officers in the position of upholding these values in the course of public discourse and may require the training of officers involved in this work, perhaps undertaking such courses as “how to deal with difficult people.”

Section 3: Evidence and Data

3.1 Describe the research/analysis you have undertaken in order to understand how the protected characteristic groups are likely to be affected?

You will be asked to detail impacts on the protected characteristic groups later on in the form.

The starting point for this proposal was the Cambridgeshire Horizon study undertaken in 2008, “Facilities for faith communities in new developments in the Cambridge sub-region.” Engagement has been made with key faith groups likely to be most directly impacted through the implementation of this process, namely the faith groups currently active in Northstowe (Emmanuel Church, Northstowe; Pathfinder Church, Northstowe; Cambridge Hindu Forum) and others sought out, including the county ecumenical officer, representing the Roman Catholic Church and a number of Protestant denominations and the Cambourne Crescent, which has established in the nearby new community of Cambourne, but has members resident in Northstowe. Although no specific surveys have been conducted within Northstowe looking at religious identity, we do have rough estimates from some groups as to their current membership in Northstowe, for example, in November 2019 there were thought to be 60 Hindu households of around 490 occupied at that time. 2011 Census data from Cambourne forms the basis of figures for religious identity in what was the ward of Bourn, which previously included Cambourne. This illustrates the different characteristics of a new community, as opposed to the district or county as a whole, with significantly greater diversity in terms of ethnicity and religious alignment. It can therefore be anticipated that Northstowe is likely to more closely mirror Cambourne in these characteristics than the villages that comprise the majority of the South Cambridgeshire population.

The groups that have been engaged as part of the process of policy development have each detailed the constraints they currently face without a dedicated base for their operations at Northstowe – this has considerable impact on the ability of these groups and their membership to faithfully observe the rituals and practices intrinsic to their religious observance. It must be noted that this policy is being developed to allocate a very limited resource, which by its nature i.e. restricted in size and the requirement for delivery within an acceptable time frame (in land use planning terms) cannot satisfy all interested parties. Therefore, the impact of success or failure in securing this resource will not be felt equally by all the parties who would wish to benefit. It should be also be noted that the religious groups who have been involved with the development of the proposal, recommend it to Council in the knowledge that it will not result in all groups gaining access to this resource. This was deemed to be acceptable, providing the policy would mean all groups would be dealt with on an equal footing.

It needs to be acknowledged that the community consultation could elicit some reaction from the public which threatens groups with protected characteristics. For example, there have been several instances over the last decade where the establishment of mosques has been resisted – a resistance led by groups with links to the English Defence League and campaigns such as those led by Gavin Boby (planning advisor and self-styled MosqueBuster).

3.2 Describe the research/analysis you have undertaken to understand any effects on any other groups of people (not mentioned in the 9 Protected Characteristics). 🗨️


No research has been identified as being undertaken locally to understand the impact on the changing ethnic and religious landscape of South Cambridgeshire as experienced by long term residents, therefore it is hard to ascertain whether the effects of this policy could impact on the identity and sense of place of people that do not fall under the protected characteristics. A view commonly expressed though consultation (most recently the CGR for Longstanton, Oakington and Westwick) is that people elect to live in a village because of the qualities of rural life – whether this includes ethnic and religious homogeneity is not understood, but the potential impact on community integration and cohesion must be recognised and dealt with should this prove to be the case.

3.3 Share where your evidence and research has been gathered from. In particular, please detail useful sources in relation to specific protected characteristic groups.

A Faith Audit for the district was planned for 2017 but not conducted. Therefore, the district council does not hold a current directory of faith groups, nor of D1 use class premises, nor collated information on planning acceptance/refusals relating to D1 use classes.

The policy briefing entitled “Faith Groups and the Planning System” produced by the Faith and Place Network* (grant funded by the Arts and Humanities Research Council) in 2015, recommends that planning authorities obtain information relating to the above. The paper states that “in order to communicate with a significant proportion of faith groups, we recommend that local planning authorities use multiple strategies for faith group engagement, Interfaith groups often provide a powerful platform from which to engage with diverse faith groups. There are, however, many faith groups that have little involvement in such forums, and as such, there also needs to be engagement with bodies representing specific religious traditions.” The engagement with faith groups to date has attempted to comply with this recommendation, but this is by no means, as yet, complete. Our engagement to date has revealed the particular pressures to re-locate to more suitable; the need to identify venues which are suitable in terms of space and reliable and consistent in terms of access; the desire for a base for operations experienced by a number of faith groups which are relevant locally.

The Cambridgeshire Insight data regarding religious identity in new communities provides valuable local insight into the future composition of the new community at Northstowe. However, it is still possible that this may not accurately reflect the make up of the current Northstowe community, nor does it take into account the impact of a particular faith group establishing in Northstowe on the religious (and potentially the ethnic) make-up of the community longer term.

3.4 Have you consulted groups that are likely to be affected by the proposal you want to implement? If so, describe the consultations and the groups involved. 

The groups invited to participate in the Northstowe Faith Strategy group are those that are likely to be affected by the proposal to be implemented. They have included leaders and representatives of

- Emmanuel Church, Northstowe

- Pathfinder Church, Northstowe
- The Cambridge Hindu Forum
- The Cambourne Crescent
- Ecumenical Council and Churches Together in England


In addition advice and guidance was sought from the community and voluntary sector representation organisation CCVS.

All participants/consultees thus far involved have endorsed the policy approach proposed.

3.5 If you have not consulted or engaged with groups that are likely to be affected by the proposal, give details about when you intend to carry out consultation, or provide reasons why this is not necessary (please provide details of any approvals you have received for this approach).

Contact will be made with Jewish and Sikh community leaders, as the policy is subject to further consultation.

Section 4: Impact of proposal

4.1 Age: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 




Neutral

Nature of impact	Positive, neutral, adverse, Negative, Positive
------------------	--




Extent of impact	Low, Medium or High
------------------	---------------------

Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.


Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.2 Disability: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 			
<p>Neutral – this is judged on the basis that any space that is obtained and provided through this policy for community uses must be constructed to current accessibility standards. Bidding groups will be asked to demonstrate their commitment to equality by providing an Equal opportunities policy as part of the bidding process.</p>			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact	Low, Medium or High		
Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			
Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?
4.3 Gender Reassignment: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 			
<p>Neutral</p>			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact	Low, Medium or High		
 Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			
Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

<p>4.4 Marriage and Civil Partnership: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic</p>			
<p>Faith groups vary according to whether their celebrants can preside over marriage ceremonies. Under UK law a marriage ceremony is only legally binding if conducted by a licensed member of the Church or a person registered by the local authority. A religious wedding can take place at any registered religious building. Same-sex couples can get married in a religious building if it has been registered for the marriage of same-sex couples (this will not include the Anglican church). An authorised person must attend the ceremony and register the marriage. For civil ceremonies the venue must either be a register office or any venue approved by the local authority.</p> <p>Some faith groups discourage or do not permit re-marriage, some do not support or permit same-sex relationships or marriage. These stances on marriage are not up for negotiation with faith groups – the proposal does not seek to exclude such groups from bidding for the faith/space allocations, but will seek to ensure that for shared community space (as opposed to dedicated worship space) the religious group managing the building/space can not impose its views on marriage and civil partnership in such a way as to discriminate (either implicitly or explicitly) against and person on the grounds of their marital or civil partnership status.</p> <p>The choice of faith group successful through the land allocation process will have an impact on the choices of the population locally to select a venue which corresponds to their own requirements for a marriage or civil ceremony.</p>			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact	Low, Medium or High		
Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			
Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.5 Pregnancy and maternity: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 			
Neutral			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact	Low, Medium or High		
Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			
Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?
4.6 Race: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 			
Issues of race and ethnicity are brought in when the allocation of faith land is considered, as alignment with a particular religious conviction can strongly correlate with ethnic background. The degree to which a particular faith group draws from a diverse ethnicity or racial background will vary significantly between faith groups, but should not be a criterion on which a faith group should be judged – any scoring matrix therefore could not include a variable for the racial/ethnic make up of the congregation. However, it would be legitimate to assess the community outreach the group intends to offer as to whether it is likely to be inclusive or exclusive in terms of race and the likely ethnic/racial profile of users of any general community space.			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact 	Low, Medium or High		
Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			

Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.7 Religion or Belief: Describe what your research and consultation has shown on the potential impacts of your proposal on this protected characteristic 


The preceding sections have focused on the potential impacts of the policy in terms of faith.

Nature of impact	Positive, neutral, adverse, Negative & Positive
------------------	---

Extent of impact	Low, Medium or High
------------------	---------------------

Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.

Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.8 Sex: Describe what your research and consultation has shown on the potential impacts of your proposal 

The proposal may impact differentially according to gender – research suggests women identify more strongly in terms of a desire to transmit culture and faith than do men. The lack of opportunity to express ethnic and religious identity may operate more profoundly in minority communities than majority communities and further still on women, although the extent of this effects is very difficult to establish. The role of women within and circumscribed by religion is a hotly debated topic and is simultaneously upheld both as an example of female agency or subjugation according to which side of the debate is taken. Again, the policy does not seek to


describe what is an acceptable in terms of religious conviction but can make practical requirements to demonstrate an equal opportunities policy and commitment to equal resourcing towards provision for men and women. A prohibition of or insistence on separation according to sex or other differential approaches could not be applied to sections of any building which was open to general community use.

Nature of impact	Positive, neutral, adverse, Negative & Positive
-------------------------	---

Extent of impact	Low, Medium or High
-------------------------	---------------------

Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.

Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.9 Sexual Orientation: Describe what your research and consultation has shown on the potential impacts of your proposal 

Again this policy does not seek to exclude faith groups on the basis of their religious conviction regarding sexual orientation, but it would require the group to abide by UK legislation with respect to this protected characteristic in the same way as any other and it would be legitimate to assess a group's commitment to ensuring that any such religious conviction would not result in either implicit or explicit exclusion of any person from using shared community space.

Nature of impact	Positive, neutral, adverse, Negative & Positive
-------------------------	---

Extent of impact	Low, Medium or High
-------------------------	---------------------

Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.

Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

4.10 Other : Describe what your research and consultation has shown on the potential impacts of your proposal			
<p>The proposal will require a demonstration that the faith/community group bidding for land/space has the financial and organisational resource to deliver within the proposed timeframe. Faith and community groups are differently resourced and this can depend as much upon the socio-economic status of their membership and ability to raise finance – potentially this could distort the field of bidders and relate less to need than to the ability to organise and resource. Furthermore, some faith groups may be constraints by administrative processes that may not align well with the timeframes which may accompany any published bidding round. It would be hard to factor out such imbalances, but assistance could be provided by officers to groups seeking funding from organisations such as the National Lottery Community Fund, or others that might recognise the social benefits of the services to the community they would seek to provide as part of their project proposal.</p>			
Nature of impact	Positive, neutral, adverse, Negative & Positive		
Extent of impact	Low, Medium or High		
Please complete the table below to detail the actions that will be taken to address impacts raised in relation to this group.			
Action	Who is the responsible officer for ensuring this action is completed?	How will the actions be monitored and when will the action be achieved?	If not achieved, what is the action plan?

Section 5: Evaluation, Conclusion and Monitoring

Work to date has sought to reconcile the intrinsic difficulties of managing a process to select a faith group or community group to benefit from the faith/community land/space allocations secured under s106 agreements for Northstowe. We have a position which seems to meet with the approval of the key groups likely to be affected by the policy, but more groups may yet need to be drawn into that consultation process. Direct engagement with the community at large on the acceptability of this proposal has yet to be undertaken, but would form a stage in the process towards adoption.

5.2 Briefly highlight the key findings of the EqIA and any significant equality issues to which the decision-maker should have due regard to when deciding whether or not to proceed with the proposal. This section serves as an Executive Summary of the EqIA and can be duplicated into any reports for decision makers.

The above assessment has drawn out the difficulties intrinsic to developing a proposal to provide a mechanism to allocate faith/community land.

5.3 Confirm the outcome of the EqIA

Tick Box

- Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.
- Adjust proposal and approve: This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect. This should be done before the proposal is implemented. Where this cannot happen the action plan must outline how you are going to achieve this.

X

- Continue with the proposal: This means adopting your proposal, despite any adverse effects or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate. In cases where you believe discrimination is not unlawful because it is justified, it is particularly important that you record what the justification is for continuing the policy, and how you reached this decision.
- Reject the proposal: If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

5.4 Who will review this proposal, when will it be next reviewed, how often will this proposal be reviewed?

As required.

5.5 Do you give permission to publish this EqlA on SCDC website? If no, please state reason.

Yes

Section 6: Sign Off

6.1 Signature of individual completing EqlA

Clare Gibbons

6.2 Date of completion

02/02/2020