

## Equality Impact Analysis

This equality impact analysis establishes the likely effects both positive and negative and potential unintended consequences that decisions, policies, projects and practices can have on people at risk of discrimination, harassment and victimisation. The analysis considers documentary evidence, data and information from stakeholder engagement/consultation to manage risk and to understand the actual or potential effect of activity, including both positive and adverse impacts, on those affected by the activity being considered.

To support completion of this analysis tool, please refer to the equality impact analysis guidance.

### Section 1 – Analysis Details (Page 5 of the guidance document)

<b>Name of Policy/Project/Decision</b>	Developer Contributions for Education Supplementary Planning Document (SPD)
<b>Lead Officer (SRO or Assistant Director/Director)</b>	David Wiggins
<b>Department/Team</b>	Strategic Planning and Infrastructure
<b>Proposed Implementation Date</b>	September 2024
<b>Author of the EqlA</b>	Natalie Blackston
<b>Date of the EqlA</b>	19.08.24

#### 1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?

The purpose of the SPD is to supplement Places for Everyone Policy JP-P5: Education, Skills and Knowledge by providing clarity on how and when the Council will seek developer contributions towards education. This includes early years, primary, secondary and those with special educational needs and disabilities (SEND).

The council has a statutory duty to make sure there are sufficient school places across the borough to meet the educational needs of the population. This includes places for early years, primary, secondary, 16-18 years and those with special educational needs and disabilities up to the age of 25.

The SPD will make sure developers are aware of the contributions they are expected to make towards education prior to housing developments taking place. Securing developer contributions where housing development creates an unacceptable impact on school places will also make sure there are adequate education provisions.

Financial contributions will be negotiated at planning application stage and will be secured through a planning obligation. The planning obligation will specify the amount of the contribution and when it will be paid. The SPD sets out how to calculate the amount of contribution required in each case.

The Council will apply a formula-based approach to calculate the financial contribution towards education provision that will be sought from new housing development:

**Number of dwellings x Pupil yield factor x Cost per pupil place  
= Financial contribution**

The financial contribution secured via this mechanism will enable the Council to fund the capital infrastructure works associated with addressing the increased pressure on school provision that the development will generate.

**Section 2 – Impact Assessment** (Pages 6 to 10 of the guidance document)

**2.1 Who could the proposed policy/project/decision likely have an impact on?**

Employees: **No (state reasons for answering ‘no’)** The SPD is intended to mitigate the impact of housing development where it creates an unacceptable impact on school places. It will not have direct equality impacts on these target groups.

Community/Residents: **Yes (state reasons for answering ‘no’)** The SPD will make sure there are sufficient school places for early years, primary and secondary, and SEND children up to the age of 25.

Third parties such as suppliers, providers and voluntary organisations: **No (state reasons for answering ‘no’)** The SPD is intended to mitigate the impact of housing development where it creates an unacceptable impact on school places. It will not have direct equality impacts on these target groups.

If the answer to all three questions is ‘no’ there is no need to continue with this analysis.

## 2.2 Evidence to support the analysis. Include documentary evidence, data and stakeholder information/consultation

### Documentary Evidence:

#### Current Policy

DfE Securing Developer Contributions for Education: [Securing developer contributions for education \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Places for Everyone: [Adoption - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](https://greatermanchester-ca.gov.uk)

### Data:

Places for Everyone has already been through the Equality Impacts Assessment (EqIA) process at the relevant stages of development. The SPD expands on policies within Places for Everyone which has already been through the Sustainability Appraisal (SA) process at various stages of its development, where identified social, economic and environmental considerations have been established and assessed as part of the plan making process.

In addition to the SA, Places for Everyone is also supported by a robust and extensive evidence base, that has been tested through the examination process by independent Government Inspectors.

Given the above, the most relevant information at this stage is the extensive range of evidence used in support of the development and examination of Places for Everyone, available to view at: [GMCA – Places For Everyone Joint DPD | Helen Wilson Consultancy Limited \(hwa.uk.com\)](https://gmca.gov.uk/places-for-everyone-joint-dpd)

### Stakeholder information/consultation:

The SPD will be subject to a six-week public consultation prior to adoption. Full consideration will be given to all the responses received as part of the consultation exercise. Amendments to the draft SPD will be made where necessary. Outcomes from the public engagement will be set out within a Consultation Statement.

Ongoing dialogue has been carried out with internal officers throughout the preparation process for the draft SPD and no issues concerning equality and community cohesion have been raised as a result of these consultations. It is proposed that, following the public consultation, a further version of the Developer Contributions for Education SPD will be brought back to Cabinet for formal approval.

**2.3 Consider the following questions in terms of who the policy/project/decision could potentially have an impact on. Detail these in the impact assessment table (2.4) and the potential impact this could have.**

- Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups? No
- Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic? No
- Could the proposal affect the usage or experience of a service because of a protected characteristic? No
- Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal? No
- Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation? No
- Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)? No
- Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council? No

<b>2.4 Characteristic</b>	<b>Potential Impacts</b>	<b>Evidence (from 2.2) to demonstrate this impact</b>	<b>Mitigations to reduce negative impact</b>	<b>Impact level with mitigations Positive, Neutral, Negative</b>
<b>Age</b>	We are facing significant challenges in providing school places due to a growing population caused by increased housing	The council has a statutory duty to make sure there are sufficient school places across the borough to meet the educational needs of the population. This includes places for early years, primary, secondary, 16-18 years and those with special educational needs and	The SPD will make sure there are sufficient school places for early years, primary and secondary, and SEND children up to the age of 25.  Financial contributions will be negotiated at planning application	Positive

	<p>development, issues within the school estate, and a growing cohort of children with specialised and complex needs. Limited funding from central government makes providing sufficient school places for children of all ages in the borough difficult.</p>	<p>disabilities up to the age of 25.</p>	<p>stage and will be secured through a planning obligation.</p> <p>The planning obligation will specify the amount of the contribution and when it will be paid.</p> <p>The SPD sets out how to calculate the amount of contribution required in each case.</p> <p>The Council will apply a formula-based approach to calculate the financial contribution towards education provision that will be sought from new housing development.</p> <p>The financial contribution secured via this mechanism will enable the Council to fund the capital infrastructure works associated with addressing the increased pressure on school provision that the development will generate.</p>	
<b>Disability</b>	<p>We are facing significant</p>	<p>The council has a statutory duty to make sure there are</p>	<p>The SPD will ensure there are sufficient</p>	<p>Positive</p>

	challenges in providing school places due to a growing population caused by increased housing development, issues within the school estate, and a growing cohort of children with specialised and complex needs. Limited funding from central government makes providing sufficient school places for children of all ages in the borough difficult.	sufficient school places across the borough to meet the educational needs of the population. This includes school places for children with special educational needs and disabilities.	school places for SEND children	
<b>Gender Reassignment</b>				
<b>Marriage and Civil Partnership</b>				
<b>Pregnancy and Maternity</b>				
<b>Race</b>				
<b>Religion and Belief</b>				
<b>Sex</b>				

<b>Sexual Orientation</b>				
<b>Carers</b>				
<b>Looked After Children and Care Leavers</b>				
<b>Socio-economically vulnerable</b>				
<b>Veterans</b>				

**Actions required to mitigate/reduce/eliminate negative impacts or to complete the analysis**

<b>2.5 Characteristics</b>	<b>Action</b>	<b>Action Owner</b>	<b>Completion Date</b>
N/A			

**Section 3 - Impact Risk**

Establish the level of risk to people and organisations arising from identified impacts, with additional actions completed to mitigate/reduce/eliminate negative impacts.

3.1 Identifying risk level (Pages 10 - 12 of the guidance document)

Impact x Likelihood = Score			Likelihood			
			1	2	3	4
			Unlikely	Possible	Likely	Very likely
Imp	4	Very High	4	8	12	16

3	High	3	6	9	12
2	Medium	2	4	6	8
1	Low	1	2	3	4
0	Positive / No impact	0	0	0	0

<b>Risk Level</b>	<b>No Risk = 0</b>	<b>Low Risk = 1 - 4</b>	<b>Medium Risk = 5 – 7</b>	<b>High Risk = 8 - 16</b>
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<b>3.2 Level of risk identified</b>	No Risk – 0
<b>3.3 Reasons for risk level calculation</b>	The council has a statutory duty to make sure there are sufficient school places across the borough to meet the educational needs of the population. This includes places for early years, primary, secondary, 16-18 years and those with special educational needs and disabilities up to the age of 25. The SPD will make sure there are sufficient school places for early years, primary and secondary, and SEND children up to the age of 25.

**Section 4 - Analysis Decision** (Page 11 of the guidance document)

<b>4.1 Analysis Decision</b>	<b>X</b>	<b>Reasons for This Decision</b>
There is no negative impact therefore the activity will proceed	X	The SPD will make sure there are sufficient school places for early years, primary and secondary, and SEND children up to the age of 25.
There are low impacts or risks identified which can be mitigated or managed to reduce the risks and activity will proceed		
There are medium to high risks identified which cannot be mitigated following careful and thorough consideration. The activity will proceed with caution and this risk recorded on the risk register, ensuring continual review		



**Section 5 – Sign Off and Revisions** (Page 11 of the guidance document)

<b>5.1 Sign Off</b>	<b>Name</b>	<b>Date</b>	<b>Comments</b>
<b>Lead Officer/SRO/Project Manager</b>	David Wiggins	13.09.24	
<b>Responsible Asst. Director/Director</b>	Cris Logue	13.09.24	
<b>EDI</b>			

**EqlA Revision Log**

<b>5.2 Revision Date</b>	<b>Revision By</b>	<b>Revision Details</b>
		This EqlA will be continually reviewed and updated as the SPD develops.