

KCC - Growth, Environment and Transport Directorate (GET).

Equality Analysis / Impact Assessment (EqIA) template

Name of decision, policy, procedure, project or service:

Heritage Conservation Strategy and Medium-term plan 2021-2026

Brief description of policy, procedure, project or service

The main activities of the Service are to provide expert historic environment planning advice to Kent County Council, Medway Council, districts and others; to maintain the Historic Environment Record as the main data source for decision-making; to manage KCC's eight historic windmills; to deliver the Portable Antiquities Scheme in Kent and to promote involvement of communities in archaeology and the wider historic environment. The Service aims to:

- Provide archaeological planning advice (over 2,000 applications per year) to KCC, Medway Council, Ebbsfleet Development Corporation, Kent's Districts (except Canterbury) and others, including the setting or agreeing of specifications for archaeological work and the monitoring of their implementation
- Manage and enhance the Kent Historic Environment Record (a computerised database with information on almost 90,000 heritage assets and features, with c. 300-400 records added each year) as required in the National Planning Policy Framework
- Develop historic environment policy particularly in relation to the implications of development
- Promote the role of the historic environment in regeneration, particularly in the growth areas
- Provide historic built environment planning advice to KCC
- Provide advice on archaeological work in connection with KCC road schemes
- Manage, maintain and safeguard KCC's eight historic windmills, in partnership with KCC Infrastructure and volunteer windmill groups, as owner of last resort

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- Manage the Portable Antiquities Scheme and assist with the Treasure process in Kent; average of 100 records added per month and over 60 Treasure cases in 2018
- Promote access to Kent's heritage through projects such as Cobham Landscape Detectives, Shorne Wood HubCAP, Fifth Continent Landscape Partnership Scheme and others
- Increase awareness of the historic environment by ensuring significant discoveries are exhibited and brought to the attention of local people where possible, seeking funding through Section 106 agreements e.g. as at Chilmington Green, Ashford

In October 2019 a paper was submitted to the Environment & Transport Cabinet Committee on the subject 'Heritage Service: current priorities and future strategy'. The paper stated that a strategy for the Heritage Conservation Service will be prepared on the basis of the priorities and work of the team. This strategy is now in preparation and is to be accompanied by this EqIA. It is envisaged that the strategy will go to public consultation in due course. Following the completion of the strategy, individual components of the service will need their own EqIAs as new initiatives and projects are brought forward.

Aims and Objectives

The aims of the project are to develop a strategy for the team that :

1. reviews Kent's historic environment
2. identifies key recent highlights for the service
3. presents the policy background for the team's work
4. sets out a Vision and high-level strategic aims with medium term issues and key objectives for each
5. identifies desired outcomes for the service
6. commits to developing an implementation plan

JUDGEMENT

- **Adjust and continue** - adjust to remove barriers or better promote equality

There is a small potential for people who cannot access digital materials (eg elderly, some disabilities) or who cannot speak English, to be unable to learn about the new Heritage Conservation strategy. This is already addressed by making committee papers available in other formats, and in other languages, on request. None of the services provided by the Heritage Conservation service are believed to have a negative impact on any protected group more than on the rest of the community. There are, however, ways that the service can impact positively on some protected groups (eg age, disability), in particular through the community archaeology, Historic Environment Record and Portable Antiquities Scheme activities. The individual components of the service will in due course require their own EqlAs to provide more information and identify ways in which the components can impact more positively on the protected groups.

Summary RAG rating to inform sign

I have found the Adverse Equality Impact Rating to be **Low**

GET Document Control


Revision History

| Version | Date | Authors | Comment |
|---------|------------|-------------|---|
| V0.1 | 17/12/2020 | Paul Cuming | |
| V0.2 | 27/01/2021 | Paul Cuming | Incorporating comments from Helen Forster on V0.1 |
| V0.3 | 07/4/2021 | Paul Cuming | Incorporating comments from Stephanie Holt-Castle on V0.2 |
| V0.4 | 13/10/2021 | Paul Cuming | Incorporating additions from Lis Dyson |

Document Sign-Off (this must be both the relevant Head of Service and the relevant Director)

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment. I agree with the actions to mitigate any adverse impact(s) that has /have been identified.

| Name | Signature | Title | Date of Issue |
|-----------------------|---|-----------------|---------------|
| Tom Marchant | Tom Marchant | Head of Service | 27/1/2021 |
| Stephanie Holt-Castle |  | Director | 20/08/2021 |

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Part 1 - Screening

Regarding the decision, policy, procedure, project or service under consideration,

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Please note that there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements

| Protected Group | You <i>MUST</i> provide a brief commentary as to your findings, or this EqlA will be returned to you unsigned | | | High/Medium/Low Favourable Impact |
|-----------------|--|------------------------|---|---|
| | High Negative Impact | Medium Negative Impact | Low Negative Impact | |
| Age | No | No | Potential impact for elderly people who may be unable to access the committee paper online. This would prevent them from learning about the service and its future direction . Consultation will include elderly groups eg Age UK Groups, Swale Senior Forum, | Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies. |

| | | | | |
|-------------------|----|----|---|--|
| | | | Citizens Rights for Older People, U3A etc. Individual EqlAs for service components will actively target such groups as appropriate. | Committee papers (for the strategy), HER data and PAS data as well as our advice documents are made available in alternative formats on request. All online materials will be tested to ensure they comply with assistive software systems as identified by the Government Digital Service Standards |
| Disability | No | No | Potential impact for people with some disabilities who may be unable to access the committee paper online. This would prevent them from learning about the service and its future direction. Consultation will include disability groups eg Disability History Group, Kent Learning Disability Partnership Board, | Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies. Committee papers (for |

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|-------------------------------------|----|----|--|--|
| | | | Compaidd, Leonard Cheshire, Ashford independent Living Scheme. Individual EqlAs for service components will actively target such groups as appropriate. | the strategy), HER data and PAS data as well as our advice documents are made available in alternative formats on request. All online materials will be tested to ensure they comply with assistive software systems as identified by the Government Digital Service Standards |
| Sex | No | No | No | |
| Gender identity/ Transgender | No | No | No | |
| Race | No | No | Potential impact for some people with limited/no English language capability . Consultation will include BME groups such as Diversity House etc. Individual EqlAs for service components will actively target such | Committee papers (for the strategy), the Consultation document on the Strategy, HER data and PAS data as well as our advice documents are made available in alternative formats on request. |

| | | | | |
|--|----|----|-----------------------|--|
| | | | groups as appropriate | |
| Religion and Belief | No | No | No | |
| Sexual Orientation | No | No | No | |
| Pregnancy and Maternity | No | No | No | Publication of committee report and completion of consultation online can also allow participation of people with limited time |
| Marriage and Civil Partnerships | No | No | No | |
| Carer's Responsibilities | No | No | No | Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies Publication of |

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|--|--|--|--|--|
| | | | | committee report online can also allow participation of people with limited time or mobility |
|--|--|--|--|--|

Next Steps

1. Having completed the screening, if you have identified High and / or Medium Negative Impacts on one or more of the Protected Groups, then move to Part 2
2. Having completed the screening, if you have identified a Low Negative Impact on all of the Protected Groups, then please complete the Judgement and the Summary RAG Rating above, and submit this form to your Head of Service and Director for sign off. Once they have both signed, please send to GETcsp@kent.gov.uk and diversityinfo@kent.gov.uk with the title of the project clearly stated along with 'Final EqlA'. It will then be logged and published on the KCC Intranet as well as available to external customers upon request.
3. If the activity will be subject to a Decision or Key Decision, the EqlA must be attached to the relevant report when submitting to Democratic Services democratic.services@kent.gov.uk. Only in exceptional circumstances will a Cabinet Committee paper be accepted without an attached EqlA/equality and diversity findings being reflected upon within the paper
4. The original signed hard copy and electronic copy should be kept with your team for audit purposes.

Part 2 - Full Equality Analysis /Impact Assessment

From the screening grid, identify the Protected Groups impacted
(Who will be affected by the changes?)

- Age
- Disability
- Race
- Pregnancy Maternity
- Carer's responsibilities

Information and Data used to carry out your assessment

(Please list your data source and if you have it provide a link to source. Please highlight any gaps)

Historic England (2020). Heritage Counts 2020 <https://historicengland.org.uk/research/heritage-counts/>

Historic England (2020) Heritage and Society 2020 <https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-and-society-2020/>

DCMS, (2020) Taking Part 2019/20 - Heritage. Annual release. <http://www.gov.uk/government/statistics/taking-part201920-heritage>

AgeUK (2018) Creative and Cultural Activities and Wellbeing in Later Life. <https://www.ageuk.org.uk/wp-assets/globalassets/oxfordshire/original-blocks/about-us/age-uk-report--creative-and-cultural-activities-and-wellbeing-in-later-life-april-2018.pdf>

Who have you involved consulted and engaged with?

(Please list stakeholders)

KCC Property Infrastructure

KCC Country Parks and Countryside Projects

Selected Kent Local Planning Authorities

Selected Archaeological Consultants

Selected Archaeological Contractors

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Analysis

The analysis below is drawn primarily from Heritage Counts 2021 and related research.

- **Age**

Younger and older groups are less likely to visit a heritage site. In a DCMS survey the age groups of 16-24 and 75+ had less respondents reporting that they had visited a heritage site in the last 12 months (60-63%) compared to other age groups (74-78%). A similar trend was seen in 2018/19, but in 2019/20, no difference in participation between the age groups 16-24 and 75+ was seen (DCMS 2020). Volunteering - a 2012 paper by Mohan and Bulloch suggested that 41% of people in core volunteering groups were over the age of 50. The Charities Aid Foundation reported in 2013 that 33% of the core was aged over 65. The ageing of this civic core has prompted some concerns over the likely outlook for volunteering in the years to come. Age UK (2018) “Our research shows a clear link between participation [in creative and cultural activities] and wellbeing”

This suggests that although there are clear benefits to older people being involved in heritage, the volunteer resource that often enables such involvements is aging. In addition younger and older people are less able/willing to visit heritage sites.

- **Disability**

17 % of people who had not visited a heritage site in 2019/20 identified disability or illness as a factor (DCMS 2020). Volunteering - the proportions of disabled and non-disabled people who participated in volunteering were similar – this was true for both formal and informal volunteering. In the year ending March 2018, 37.7% of disabled people had taken part in formal volunteering in the previous 12 months compared with 41.9% of non-disabled people. For informal volunteering, 56.9% of disabled people participated compared with 53.5% of non-disabled people (ONS).

This suggests that disabled people are as enthusiastic about volunteering as other groups but sometimes find it difficult to visit heritage sites.

- **Sex**

Historic England’s ‘Pride of Place’ initiative (2016) has highlighted the range of heritage structures that help tell the story of England’s LGBTQ community, the degree to which these are under-represented in HERs, and has suggested ways that recording initiatives (eg in HERs) can be developed to address the imbalance.

- **Gender**

A greater proportion of volunteers in the Sport and Heritage sectors were men than women in 2017-18. In Heritage, 67% of volunteers were male and 33% were female (DCMS Community Life Survey and Taking Part Survey 2017-18).

- **Race**

Engagement with heritage varies widely between young people from different ethnic groups. Young people of Black Caribbean origin had relatively low levels of heritage engagement (39%) compared with a higher level for white young people (59%) (Lahey et al (2017) 'Culture, Sport and Wellbeing'). In terms visiting heritage sites a significant gap exists between the participation rates of people with ethnicities described as White (75.3% participation), Asian (59.5%) and Black (41.1%), compared with an overall average of 73% (DCMS 2020, Heritage Taking Part Survey 2019/20).

- **Religion and Belief**

It is generally recognised that traditional heritage practices in the UK have neglected non-Christian and non-religious audiences, their areas of interest and related heritage structures. Precise statistics on this are lacking though. There are good exemplar projects for recording the structures of different faith groups (eg Shaheen (2018) 'The British Mosque: An architectural and social history' and Kadish (2015) Jewish Heritage in Britain and Ireland).

- **Sexual orientation**

Historic England's 'Pride of Place' initiative (2016) has highlighted the range of heritage structures that help tell the story of England's LGBTQ community, the degree to which these are under-represented in HERs, and has suggested ways that recording initiatives (eg in HERs) can be developed to address the imbalance.

- **Pregnancy Maternity**

We believe that no research has been carried out about this protected group to date with regard to heritage issues.

- **Marriage and civil partnership**

We believe that no research has been carried out about this protected group to date with regard to heritage issues.

- **Carer's responsibilities**

We believe that no research has been carried out about this protected group to date with regard to heritage issues.

Adverse Impact,

(What is the effect on the protected group? Please state mitigation in the action plan provided in Part 3, if an action is intended)

- **Age**

Potential impact for elderly people who may be unable to access the consultation paper online. This would prevent them from learning about the service and its future direction. Consultation will include elderly groups eg Age UK Groups, Swale Senior Forum, Citizens Rights for Older People, U3A etc. Individual follow-on EqlAs for service components will actively target such groups as appropriate.

- **Disability**

Potential impact for people with some disabilities who may be unable to access the consultation paper online. This would prevent them from learning about the service and its future direction. Consultation will include disability groups eg Disability History Group, Kent Learning Disability Partnership Board, Compaid, Leonard Cheshire, Ashford independent Living Scheme. Individual follow-on EqlAs for service components will actively target such groups as appropriate.

- **Race**

Potential impact for some people with limited/no English language capability. Consultation will include BME groups such as Diversity House etc. Individual follow-on EqlAs for service components will actively target such groups as appropriate

Positive Impact:

(Please highlight any positive impacts in relation to protected groups)

- **Age**

Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies. Committee & consultation papers (for the strategy), HER data and PAS data as well as our advice documents are made available in alternative formats on request. All online materials will be tested to ensure they comply with assistive software systems as identified by the Government Digital Service Standards

- **Disability**

Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies.

Committee and consultation papers (for the strategy), HER data and PAS data as well as our advice documents are made available in alternative formats on request. All online materials will be tested to ensure they comply with assistive software systems as identified by the Government Digital Service Standards

- **Race**

Committee and consultation papers (for the strategy), the Consultation document on the Strategy, HER data and PAS data as well as our advice documents are made available in alternative formats on request.

- **Pregnancy/maternity**

Publication of committee report and completion of consultation online can also allow participation of people with limited time

- **Carer's responsibilities**

Service adjustments that can address this group proactively will be identified in the relevant objective/s that make up the new Strategy. These are likely to be the HER, Community Archaeology, Portable Antiquities Scheme & communications strategies

Publication of committee report online can also allow participation of people with limited time or mobility

JUDGEMENT

There is a small potential for people who cannot access digital materials (e.g. elderly, some disabilities) or who cannot speak English, to be unable to learn about the new Heritage Conservation strategy. This is already addressed by making committee papers available in other formats, and in other languages, on request. None of the services provided by the Heritage Conservation service are believed to have a negative impact on any protected group more than on the rest of the community. There are, however, ways that the service can impact positively on some protected groups (e.g. age, disability), in particular through the

community archaeology, Historic Environment Record and Portable Antiquities Scheme activities. The individual components of the service will in due course require their own EqlAs to provide more information and identify ways in which the components can impact more positively on the protected groups.

The judgement therefore is that we will **adjust and continue**.

Next Steps

- 1. Having completed Part 2, if you have identified potential for adverse impact on particular groups and have found scope to improve the proposal, then move to Part 3**
- 2. Having completed Part 2, if you have identified potential for adverse impact on particular groups but no scope to improve the proposal (remembering that there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements) then please complete the Judgement and the Summary RAG Rating above, and submit this form to your Head of Service and Director for sign off. Once they have both signed, please send to GETcsp@kent.gov.uk and diversityinfo@kent.gov.uk with the title of the project clearly stated along with 'Final EqlA'. It will then be logged and published on the KCC Intranet as well as available to external customers upon request.**
- 3. If the activity will be subject to a Cabinet decision, the EqlA must be submitted to Democratic Services democratic.services@kent.gov.uk along with the relevant Cabinet report.**
- 4. The original signed hard copy and electronic copy should be kept with your team for audit purposes**

Part 3 - Action Plan

Document the range of options and identify the effects of each. Identify the option(s) chosen and document the reasons for this.

| Protected Characteristic | Issues identified | Action to be taken | Expected outcomes | Owner | Timescale | Resource implications |
|---|---|---|--|-----------|-----------|-----------------------|
| Age, Disability, Race, Maternity and Carers | HER, Community Archaeology, Portable Antiquities Scheme & communications strategies all have opportunities to make a favourable impact on these characteristics | EqIA to support the planning and delivery of the relevant objective in the strategy once agreed | Improved engagement from those with one or more of these characteristics with the benefits heritage provides | Lis Dyson | 6 months | Staff time |
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Have the actions been included in your business/ service plan? (If no please state how the actions will be monitored)

Yes/No

Next Steps

1. Having completed Part 3, then then please complete the Judgement and the Summary RAG Rating above, and submit this form to your Head of Service and Director for sign off. Once they have both signed, please send to GETcsp@kent.gov.uk and diversityinfo@kent.gov.uk with the title of the project clearly stated along with 'Final EqIA'. It will then be logged and published on the KCC Intranet as well as available to external customers upon request.

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