

Equality Impact Assessment For employees and/or communities

This EIA form will assist you to ensure we meet our duties under the Equality Act 2010 to take account of the needs and impacts of the proposal or function in relation to people with protected characteristics. Please note, this is an ongoing duty. This means you must keep this EIA under review and update it as necessary to ensure its continued effectiveness.

Section 1: Proposal details

Directorate / Service Area:		Person undertaking the assessment:	
Place and Economy, Environment and Commercial Services		Name:	Richard Whelan
Proposal being assessed:		Job Title:	Principal Officer Flood and Water
Local Flood Risk Management Strategy Update		Contact details:	07557591697
Business Plan Proposal Number: (if relevant)	N/A	Date commenced:	14/07/2021
		Date completed:	15/10/2021
Key service delivery objectives:			
Under the Flood and Water Management Act Cambridgeshire County Council have a duty to prepare and monitor a Local Flood Risk Management Strategy. This Strategy sets out how the council and its partners will manage flood risk across the county. The Strategy is an existing document but needs updating.			
Key service outcomes:			
Local Flood Risk Management Strategy kept up to date as required by the Flood and Water Management Act 2010 and is consistent with the new National Flood and Coastal Erosion Strategy as is required.			
The Strategy will look to outline flood risk management activities in Cambridgeshire from 2021-2027			
What is the proposal?			
Several national and local policy and legislative drivers have been introduced or updated since the last revision of the local strategy in 2015. The new strategy needs to reflect these changes and changes to the risk and the way it is managed in Cambridgeshire.			
The Strategy does not introduce any new assessment of risk in Cambridgeshire and is a light touch on the information included in the previous strategy but is looking to incorporate wider representation in areas such as environmental concerns.			
What information did you use to assess who would be affected by this proposal?			

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Guidance on completing EqIA

Assessment of the previous Strategy

Learning taken from Community engagement as a part of the OxCam Property Flood Resilience Pilot project hosted by Northamptonshire County Council. One area of concern for this is the significant drive nationally to consider this as a solution for areas where other schemes do not achieve the necessary funding scores, these schemes rarely come with funding meaning those able to afford to protect their properties are in a better position to act.

Deprivation indices of our flooding communities both on Gov.uk and CCC web pages.

Conversations and presentations around the Future Fens Integrated Adaptation project, notably to include deprivation, rural isolation, impacts of climate change on health and the relationship with the water environment. Also, the impacts on the farming community.

CCC Branding guidelines used to assist in presentation

CCC Accessibility guidance used to assess what alterations in presentation or communication may be required, considering impacts such as how the strategy would be made available, colour combinations and exploring options to use tables, figures and images instead of words, and the use of hyperlinks.

Findings from local and regional investigations of recent flooding events, including the causes and impacts of those.

Are there any gaps in the information you used to assess who would be affected by this proposal?

The economic or isolation impact on communities associated with flooding – such information is not currently widely collected

Geographical spread of vulnerable individuals – data is held by partners and made available in an emergency. The Strategy avoids going into the detail of specific locations, however, there are expected to be projects in the action plan which is still being developed and will not be put forward with this strategy. We anticipate that we may discover funding is more difficult to acquire in more deprived areas due to the nature of centralized government funding that requires partnership contributions to schemes. National research has previously highlighted concerns around how this can disproportionately affect different communities, but we are unlikely to know exactly where this will apply until we try to develop those projects.

Who will be affected by this proposal?

The proposal has the potential to positively benefit everyone in the local authority area, however, certain groups will be affected in more specific ways;

- Access to warnings, mobile reporting or other digital services such as electronic versions of the strategy, for those with difficulty in accessing these products such as older people

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- Access to this strategy or other guidance online, based on disability, language or equal access to internet
- Traditional funding mechanisms for flood risk schemes often struggle to achieve the necessary benefit cost ratios for both rural and dense urban environments; typically meaning those schemes in more deprived urban environments or remote rural locations may find it harder to acquire funding
- At present it is unclear if there is a difference in the uptake of property level resilience between owned/ accommodated or rented accommodation
- In responding to emergencies sandbags are not distributed as a matter of course. If they are, they will be focused to more vulnerable residents or infrastructure based on the information held by emergency responders, however they tend to be ineffective in providing protection
- Those in single storey properties with greater mobility issues in other homes may struggle to move to safety or relocate possessions to a safe point in the event of an emergency

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included interviews with many partners who experienced similar challenges to those found locally which include;

- Difficulties raising funds and obtaining sufficient benefit to release funds in rural communities
- Contrasting difficulties in the dense urban environment where more funding was typically available but costs were considerably higher due to the complexity of schemes and therefore unable to meet treasury rules.
- The difficulty in obtaining funding for those at risk of surface water flooding

It is anticipated further data will be available through the completion of the OxCam property flood resilience project on the practicalities of using resilience measures that do not require manual handling but also on the issues associated with fair distribution of funding or resilience measures. Learning from this should be available before spring 2022 and can be built into our first review of our action plan in 2022.

Consultation evidence

State who was consulted and when (e.g., internal/external people and whether they included members of the affected groups). State which potentially affected groups were considered. Append consultation questions and responses or equivalent.

Findings from recent flood events were considered as a part of the strategy and will be considered as the action plan is developed. These findings consider how in some communities such as March, the past economic situation has led to issues such as new developments being completed without all the appropriate drainage infrastructure in place. Further details on this are expected to be available through Section 19 reports and partnership investigations.

As a part of the updating of the text of this strategy each of the partners in the Cambridgeshire and Peterborough Local Flood Risk Management Strategy have been invited to participate in the update. Contributions have been received from most partners. Further discussions with this group, including newly elected members as participants, took place in the summer. Conversations are expected to continue through the autumn as the action plan is developed.

Internal team and officer meetings have also taken place to ensure the strategy is consistent with local experience and other connected strategies.

The strategy has previously been shared with our Assistant Director and will be again followed by our normal approval process prior to committee review.

A public consultation for the strategy is anticipated to take place in the Autumn following the necessary committee agreement. The event will be communicated through the new connections made as a part of the community engagement that is underway.

There is a workstream called the Community Flood Action Programme being led by the Flood risk and biodiversity team through 2021-22. A part of this project will be to engage with local communities and develop new tools, plans and flood groups for those communities. The input from this work will be considered as the

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strategy progresses through scrutiny. This Programme will also provide opportunity to ensure that new online platforms and materials that are developed to support communities are consistent with the strategy and that learning from the engagement process is used to adapt the strategy as required.

Based on consultation evidence or similar, what positive impacts are anticipated from this proposal?

This includes impacts retained from any previous arrangements. Use the evidence you described above to support your answer.

The Strategy will look to share information relating to flood risk, roles and responsibilities and highlight actions that are being considered.

- signposting ways for people to better understand their risk – understanding who to contact and when has been highlighted as a notable issue for residents historically. It should be noted that a public friendly summary is being developed and will be ready this autumn
- highlighting steps to make Cambridgeshire more resilient to climate change
- join flood risk ambitions with those of other departments in the county council and our partners to help unlock previously unfeasible projects and building in more benefits to residents such as access to green space
- confirm emergency response and recovery roles for different partners so the public know what to expect, also to include an action to review the way in which emergencies are managed.
- Development of schemes to benefit communities, considering factors such as access to open space and accessibility issues when planning schemes
- Development of schemes in partnership to make those in more deprived communities more feasible through the delivery of multiple benefits, examples include exploring making space for water as a part of Market Towns funding in St Neots and March.

Based on consultation evidence or similar, what negative impacts are anticipated from this proposal?

This includes impacts retained from any previous arrangements. Use the evidence you described above to support your answer.

The strategy itself is not anticipated to trigger any negative impacts on communities but there are considerations of some messages being communicated, even if those are already public knowledge in some circles.

The strategy will need to be accessible to all, but elements of the strategy are going to need to incorporate more technical elements, due to the anticipated audience, whilst we will endeavour to use plain English throughout there may sometimes be technical terms, which, if not used, could lead to further confusion in the target audience.

The strategy will highlight the limitations and constraints associated in delivering schemes equally across all environments and to all protected characteristics

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Equally the strategy will highlight how these constraints and restrictions in statutory duties may mean that those at risk from certain types of risk may need to take greater steps themselves.

Recent evidence from the OxCam property flood resilience project suggests that this engagement may be more challenging in areas with higher proportion of rental properties or in more deprived areas where there are perhaps more pressing concerns for residents.

How will the process of change be managed?

Poorly managed change processes can cause stress / distress, even when the outcome is expected to be an improvement. How will you involve people with protected characteristics / at risk of poverty/isolation in the change process to ensure distress / stress is kept to a minimum? This is particularly important where they may need different or extra support, accessible information etc.

Creation of a public friendly, more legible and less technical version of the strategy, this could potentially be distributed to libraries or community centres for those who may not be able to access digital services. There will need to be consideration of alternative language versions as demand requires, this is anticipated to be more important as a part of the community documentation being created in a programme of work separate to the strategy.

The change by way of an updated strategy will be consulted and developed with experience from across the county council and its partners, including elected member feedback.

Input from communities will also be included as a result of flood reports which are considered in this strategy. Community engagement as a part of the Community Flood Action Programme will also feed into the development of this strategy and any products created by that programme. That engagement has already started and is expected to continue throughout the time this strategy is developed and beyond. Feedback coming after the approval of the strategy can be incorporated through annual reviews of the strategy Action Plan

An assessment of the more localised impacts of a project delivered as a part of the strategy will need to take place as the details of those projects and potential options are developed.

A review of emergency plans relating to these risks is anticipated to take place and considerations over issuing warnings and assistance for vulnerable community members or those with protected characteristics will need to form a part of that review. Partners such as Anglian Water hold lists of vulnerable residents which is made available during an emergency, a review of this data will help to assess whether all of those with particular needs are considered and identifiable during an emergency. For non-emergency considerations (such as council projects), each project will need to consider the impacted audience in the same way that the environment and carbon are affected to ensure that the benefits that can be achieved, were practicable, as a part of any work we do.

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A public consultation will take place later in the year to allow communities to feed into the development of the strategy. We will use refreshed and newly created community engagement channels to make the consultation process widely known.

The flood risk and biodiversity team will continue to monitor changes to funding requirements, new funding opportunities or partnership projects which provide opportunities to encourage investment in areas where interventions are harder to achieve, such as through the Future Fens work being delivered by Anglian Water and the Environment Agency which are looking to consider the wider community and pressures such as education, deprivation, health and jobs across the Fens.

The flood risk and biodiversity team will also monitor national resilience pilot projects which are currently underway to identify new methods of communicating risk with communities where engagement has traditionally been more challenging.

How will the impacts during the change process be monitored and improvements made (where required)?

How will you confirm that the process of change is not leading to excessive stress/distress to people with protected characteristics / at risk of isolation/poverty, compared to other people impacted by the change? What will you do if it is discovered such groups are being less well supported than others?

The Cambridgeshire and Peterborough Flood and Water Partnership act as the body governing the annual review of this strategy, this includes elected representatives and partner organisations. The Actions in our plan, which are still under development, will be reviewed on an annual basis by this partnership and any learning from public engagement or further assessments will be used to help us reprioritise our work.

The county council is currently supporting the development of flood action groups across the county, ongoing open communications with these groups is expected in future and can act as a means of understanding community needs in some communities. The county will need to be strong in ensuring any changes to processes are evenly distributed and communicated beyond the groups with community representation.

The Flood and Water Supplementary Planning Document is anticipated to be updated in the next two years and this provides an opportunity to further consider the range of implications associated with new development.

Where the county council encounter barriers to delivery or find difficulties in achieving wider benefits this will be assessed through a project learning debrief and this will be used to inform feedback to national consultations and in the development of future projects.

All team members will carry out mandatory training as required and be encouraged to sign up for additional training especially if skills gaps are identified in the project delivery team.

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Section 4: Equality Impact Assessment - Action plan

See notes at the end of this form for advice on completing this table.

Details of disproportionate negative impact (e.g., worse treatment / outcomes)	Group(s) affected	Severity of impact (L/M/H)	Action to mitigate impact with reasons / evidence to support this or Justification for retaining negative impact	Who by	When by	Date completed
The strategy include technical elements which are likely to be difficult to understand for the older less technical age group and those with English as second language	Older age group, racial minority group,	M	Creation of a public friendly, more legible and less technical version of the strategy, as a part of the community documentation, available in digital and non-digital formats	Flood Risk Team	November 2021	
The strategy will highlight the limitations and constraints associated in delivering schemes equally across all environments and to all protected characteristics	Rurally isolated, deprived communities	H	<p>The county may not be able to prevent the continuation of this negative impact as it is one felt across the industry. However, the County Council will work with partners to identify ways of overcoming delivery and funding barriers that exist, including identifying new funding opportunities.</p> <p>1. A specific action relating to March has been incorporated into the Action Plan following several barriers to effective delivery being highlighted.</p> <p>2. Learning can then be carried forward from this to delivering schemes in other communities</p>	Flood Risk Team	<p>1. October 2021</p> <p>2. Ongoing</p>	1. 01/09/2021

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Details of disproportionate negative impact <i>(e.g., worse treatment / outcomes)</i>	Group(s) affected	Severity of impact <i>(L/M/H)</i>	Action to mitigate impact with reasons / evidence to support this or Justification for retaining negative impact	Who by	When by	Date completed
The strategy also highlights how constraints and restrictions in statutory duties may mean that those at risk from certain types of risk may need to take greater steps themselves	Older age groups, less mobile residents, deprived communities and those of pregnancy or maternity	M	<p>1. There is a national drive to increase awareness among property owners of their responsibility to become more resilient. The County Council are aware that some residents are in a better position to help themselves than others, at present there are some funding variations that reflect the greater need for help in deprived communities but not for all characteristics, the county will look at options to improve this with partners.</p> <p>2. In the interim officers will look to provide targeted advice through community flood action programme and other community engagement to help mitigate this.</p>	Flood Risk Team	<p>1. Ongoing to next strategy review</p> <p>2. March 2022</p>	
Recent evidence from the OxCam property flood resilience project suggests that this engagement may be more challenging in areas with higher proportion of rental properties or in more deprived areas where there are perhaps more pressing concerns for residents.	Older age groups, deprived communities	M	<p>1. As a part of the Community Flood Action Programme a mobile unit will be visiting high risk communities to be available in person. Copies of the strategy will also be distributed to community centres so paper copies can be obtained central to those communities.</p> <p>2. Separately, where flood prevention schemes are underway specific communities will be consulted with using</p>	Flood Risk Team	<p>1. March 2022</p> <p>2. Ongoing</p>	

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Details of disproportionate negative impact <i>(e.g., worse treatment / outcomes)</i>	Group(s) affected	Severity of impact <i>(L/M/H)</i>	Action to mitigate impact with reasons / evidence to support this or Justification for retaining negative impact	Who by	When by	Date completed
			bespoke communication methods appropriate to those communities.			

Section 5: Approval

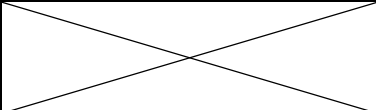
Name of person who completed this EIA:	Richard Whelan	Name of person who approves this EIA:	
Signature:	RW	Signature:	
Job title:	Principal Officer Flood and Water	Job title: <i>Must be Head of Service (or equivalent) or higher, and at least one level higher than officer completing EIA.</i>	
Date:	15/10/2021	Date:	

Guidance on completing the Action Plan

If our EIA shows that people with protected characteristics and/or those at risk of isolation/poverty will be negatively affected more than other people by this proposal, complete this action plan to identify what we will do to prevent/mitigate this.

Severity of impact

To rate severity of impact, follow the column from the top and row from the side and the impact level is where they meet.

	Severity of impact				Priority and response based on impact rating		
	Minor	Moderate	Serious	Major	High	Medium	Low

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Likelihood of impact	Inevitable	M	H	H	H	<i>Amend design, methodology etc. and do not start or continue work until relevant control measures are in place. Or justify retaining high impact</i>	<i>Introduce measures to control/reduce impact. Ensure control measures are in use and working. Or justify retaining medium impact</i>	<i>Impact may be acceptable without changes or lower priority action required. Or justify retaining low impact</i>
	More than likely	M	M	H	H			
	Less than likely	L	M	M	H			
	Unlikely	L	L	M	M			

Actions to mitigate impact will meet the following standards:

- Where the Equality Act applies: achieve legal compliance or better, unless justifiable.
- Where the Equality Act does not apply: remove / reduce impact to an acceptably low level.

Justification of retaining negative impact to groups with protected characteristics:

There will be some situations where it is justifiable to treat protected groups less favourably. Where retaining a negative impact to a protected group is justifiable, give details of the justification for this. For example, if employees have to be clean shaven to safely use safety face masks, this will have a negative impact on people who have a beard for religious reason e.g. Sikhism. The impact is justifiable because a beard makes the mask less effective, impacting the person's safety. You should still reduce impact from a higher to a lower level if possible, e.g. allocating work tasks to avoid Sikhs doing tasks requiring face masks if this is possible instead of not employing Sikhs.