

**Equality screening and Full Impact Assessment template**

*Note: Please delete guidance notes (in italics) after completing the form*

<b>Name of a policy / procedure / function / project:</b> <b>ENFORCEMENT POLICY</b> <b>Date:01.6.2010</b> <b>Carried out by: Lyn Collins</b>	
<b>Name</b>	<b>Role</b>
Margaret Morris	Parking Services – Civil Parking Enforcement
David Lennon	Streetscene Enforcement
Steve Williams	ITS / Highways
Rod Brookfield	Planning Services
Richard Wood	Private Sector Housing
Petra Dexter Duskova	Equality and Diversity ( Assisting Role)
Angela Jones, Graham Aveyard, Mark Green, Andrew Rees	Regulatory Services Team Leaders Environmental Health and Trading Standards input from a workshop 26 May 2010

**Aims of the policy:**

**Ensure consistent, fair and proportionate enforcement by all Regulatory Services of CWAC**

**Stakeholders:**

**Public, Businesses, External Partners - Environment Agency, HSE, OFT, HPA, DEFRA. Service Receivers ie Pest Control. Highways Agency, VOSA, Police, DVLA, CRB Bureau, Elected Members, Registered Social Landlords, Landlords - Very Broad Spectrum**

**Considering the purpose of the Equality Impact Assessment process, is the policy (function, procedure etc.) relevant?**

Yes  No

Quick check:

- ✓ *Is the policy (function, procedure etc.) concerned with people?* Yes  No
- ✓ *Is the policy (function, procedure etc.) outward looking (i.e. community, employees, partners)* Yes  No
- ✓ *Does the policy (function etc.) involve face to face contact?* Yes  No
- ✓ *Does it include making decisions based on someone's individual Characteristics, circumstances or needs?* Yes  No
- ✓ *Is there history of long-established pattern of unequal outcomes? (and do I have enough evidence to prove otherwise?)* Yes  No  Where no it is difficult to prove
- ✓ *Is the policy (function, procedure....) likely to have a significant impact on someone's life or wellbeing?* Yes  No

*Exit the process if you answered No to all of the above questions, otherwise please continue.*

<b>Potential impact on target groups:</b>		
Target group	Potential impact <i>Please describe</i>	Measures currently in place
<b>Race</b> <i>(also ethnicity, nationality and associated aspects such as culture and language)</i> <b>Gypsies and Travellers</b>	<b>Knowledge of Services</b>  <b>Access to Services</b>  <b>Understanding of Services</b>	High Volume information available in a range of different languages ie Food Safety, Planning Appeal Documents via the planning portal.  Information being provided in picture format – streetscene  Website able to read content to customer.  Text phone facility  All service can access The Big Word translation service.  Gypsy and Traveller Liaison officer in post to assist.  See all
<b>Disability</b> <i>(consider full rainbow of mental and physical impairments: mobility, manual dexterity, speech, hearing, learning, understanding, visual sight, MS, cancer, HIV etc.)</i>	Older hard of hearing people often cause noise nuisance.  Sensitivity to circumstances	Service information to advise regarding this.  See all
<b>Gender</b> <i>(consider associated aspects e.g. safety, single-parenting, caring responsibility, potential for bullying and harassment,</i> <b>Transgender</b>		Awareness of dealing sensitively with the legal title change is known in the licensing team where impact is greatest.
<b>Sexual orientation</b> <i>(includes heterosexual, lesbian,</i>		

<b>Potential impact on target groups:</b>		
<b>Target group</b>	<b>Potential impact</b> <i>Please describe</i>	<b>Measures currently in place</b>
<i>gay, bi-sexual)</i>		
<b>Age</b> <i>(including all groups - children, young people, working age, elderly)</i>	Inappropriate treatment of an "offending" minor	Services aware of need to treat under 17's as minors and involve parents. National guidance is applied for minors and elderly.  Services flag vulnerable children to relevant teams.
<b>Religion and belief</b> <i>(the most common religions include Hinduism, Judaism, Buddhism, Christianity, Islam, Sikhism, Shinto, Nonconformists)</i>	Inspection at inappropriate times ie ramadan.	Food officers have undergone training on food safety for various religious groups organised by the FSA.
<b>Rural issues</b>	Access to services  Service response times in rural areas	Main means of communication is via telephone and text phone with visit being offered to the vulnerable and immobile.  Service locations recognise the need for manageable response times to all parts of the borough.  Use of Parish Councils as a means of communication (Planning).
<b>Socio-economic issues</b>	Inability to read correspondence. Illiteracy in areas of multiple deprivation can be as much as 1:4. Can also affect farming communities	Ability to read checked and service does not assume ability to read when enforcement action is taken. Officers will visit to explain.
<b>All</b> <i>(there may be other target groups relevant to your service)</i>		Where needs are known at the point of enquiry or during investigation visits are tailored accordingly and a visit is made in preference to sending a letter where customers are more vulnerable.  The services have a prescribed prosecution and notice decision making process that ensures the specific circumstances of the individual are taken into account in the decision.

**Is the Policy/Function likely to have an impact on Human Rights?**

*We all have basic human rights which must be upheld. Human rights are about ensuring Fairness, Respect, Equality, Dignity and Autonomy (FREDA) for everyone. Everyone has the right to enjoy their basic human rights such as right to life and not be treated in an inhuman or degrading manner, protected by the Human Rights Act 1998.*

**Evidence:**

*Evidence to support the above answers. Customers' equality data monitoring and how the results inform service provision. Please consider quantitative, qualitative research, national and international evidence, results of any consultations you might have carried out. Please refer to the Equality Monitoring Guidelines on the intranet (or contact the E&D Managers) when considering introducing equality monitoring initiatives.*

**Proposed actions (to be reflected in the Service plans):**

*Actions emerging from the "Potential impact on target groups" and the "Evidence" sections in order to address any gaps*

<b>Action</b>	<b>Target date</b>	<b>Responsibility</b>
Contact Centre need to be aware of up to date service contacts to ensure that best service is provided to them at the most accessible office.	31 July 2010 PRIORITY HIGH	All Service Leads
Contact centre needs to be able to collate equality data at the first point of contact to feed into the services. Nationality data and communication and disability needs, need to be identified at the first point of contact.	TBC  PRIORITY HIGH	Customer Contact Team, Equality and Diversity and Research and Intelligence Project, supported by services.
All Services to consider pictures in the development of service information	Ongoing subject to an annual progress review PRIORITY HIGH	Service supported by Communications
Ongoing cultural and specific target group awareness training to be delivered.	Ongoing programme PRIORITY MED	Equality and Diversity Team
Specific Service related cultural and specific target group awareness training to be delivered on a cascade basis to teams by designated lead officer, and knowledge of target groups to be shared through team meetings and across teams.	31 July 2010 PRIORITY HIGH  (easy to implement)	Equality and Diversity Agenda Item to share learning. All service leads to share intelligence

		through briefing.
Services must include the Equality Statement on all outgoing information, notices, leaflets etc.	31.12.2010 PRIORITY HIGH	To be met through harmonisation projects.
Include a question about ease of access to the service on all customer feedback questionnaires to identify what customers think we can do better.	31.12.2010 PRIORITY MED	Service Team Leaders Part of Peer Challenge Improvement Plan
A welcome pack to be developed for all new CWAC residents signposting key services and signposting access to service issues. This will assist rural customers and others. This can also invite any access issues at first point of becoming a CWAC resident.	IDEA for Customer First	Council Tax supported by high volume services and Communications
Introduce a simple flag system on the new Regulatory Services IT system to identify racial, cultural, disability etc needs attributable to a known address/contact.	31.12.2010 PRIORITY MED	Reg Services IT project team
List of target groups representatives, contact details to be made available in a central place on the CWAC website / I west for services to select from and add to for service relevant consultation to ensure consultation is inclusive. Electronic facility for updating can rest with all users.	Prior to next consultation on the Council Enforcement Policy. 31.3.2011 PRIORITY MED	Equality and Diversity Team & R&I supported by services.
A list of key internal service areas/internal contacts to be developed, where possible, to assist services deal with prioritised elements of disability, or mental health, rural issues, cultural and religion.	TBC PRIORITY MED	Equality and Diversity Team

All services to use Parish Councils for information dissemination in the Rural Areas where appropriate.	Ongoing (Resource)	Service Leads
The prosecution decision making procedure applied in Reg Services and Streetscene can be applied more widely in planning and highways to ensure principles of enforcement policy are met.	31.12.2010 PRIORITY MED	Service Leads Planning and Highways.

<b>Rating:</b>								
<i>In light of the above how would you rate the impact of your policy/function etc. on any of the target groups, for guidance please see footnotes.</i>								
	Race	Disability	Gender	Sexual orientation	Age	Religion & belief	Rural Issues	Other
<b>High<sup>1</sup></b> <i>Please continue below</i>								
<b>Medium<sup>2</sup></b> <i>Please exit the process</i>		<b>2</b>			<b>2</b>	<b>2</b>	<b>2</b>	
<b>Low<sup>3</sup></b> <i>Please exit the process</i>	<b>1</b>		<b>1</b>	<b>1</b>				

**IMPORTANT!**

**Only policies (functions, procedures etc.) rated as high have to be fully Impact Assessed. Full Impact Assessment requires consultation with members from the target groups highlighted as being at the receiving end of any potential impact. EIA consultation exercises will be undertaken by relevant service with the help and support of the Research and Intelligence team and Equality and Diversity Officers.**

<sup>1</sup> High = significant potential impact, risk of exposure, history of complaints, no mitigating measures in place or no evidence available, urgent need for consultation with service users, general public, employees

<sup>2</sup> Medium = some potential impact, some mitigating measures in place but no evidence available how effective they are, would be beneficial to consult with service users, general public etc. but not urgent

<sup>3</sup> Low = almost bordering with non relevance to the EIA process (heavily legislation led - very little discretion exercised, limited public facing aspect)

**Full Equality Impact Assessment part:**

<b>Affected target group</b> <i>(e.g. people with disabilities)</i>	<b>Race</b>	<b>Disability</b>	<b>Gender</b>	<b>Age</b>	<b>Religion &amp; belief</b>	<b>Rural</b>
Any particular segment within the target group <i>(e.g. people with learning disabilities)</i>						
Specific issues to be a subject of consultation <i>(e.g. how could the Council make its annual financial results understandable to people with learning disabilities, what support needed etc.?)</i> Please contact the Research and Intelligence team: <a href="mailto:beverley.wilson@cheshirewestandchester.gov.uk">beverley.wilson@cheshirewestandchester.gov.uk</a>						
Outcomes of consultation						
<b>What changes have been made as a result of the consultation outcomes</b>						
Feedback given to the consultees? Yes/No						

.....  
**Lead person responsible the EIA**

.....  
**Approved by Head of Service**

**Date:**

**Next review of the EIA, measures put in place, changes:**

*(high – 1 year, medium – 2 years, low – 3 years)*