

EQUALITY IMPACT ASSESSMENT

Name of Policy/Service/Function	Enforcement Service Review
Date of Assessment	April 2007
Directorate	Chief Executives
Head of Service	Robin Tuddenham
Names and Roles of the people carrying out the EIA	Michelle Bridge – Street Crime Warden Manager
Why is the Equality Impact Assessment being done?	To accompany the recommendations set out in the Cabinet Report focussing on Enforcement Services

1. Introduction and Background

1.1 The street crime warden service is an existing service that was established in 2003 to address issues of anti-social behaviour, and enviro-crime. This was delivered through the provision of a highly visible uniformed presence targeting specific locations initially within the Leyton area.

Due to the success of warden schemes both locally and nationally the initiative grew rapidly, and over the last four years within the Borough of Waltham Forest, two additional warden schemes have been implemented in Leytonstone and High Street - Walthamstow, bringing the total number of wardens to twenty seven.

In addition to tackling anti-social behaviour and enviro-crime, wardens have also developed their role substantially to include youth diversionary work, community re-assurance and engagement, and more recently community cohesion.

The Enforcement Service Review was established to ensure that the Council and its key partners make full and proactive use of powers available to them delivering an efficient and effective enforcement service maximising the impact of the on-street presence. This enables Local Area Agreement priorities to be met including reducing enviro-crime and anti-social behaviour, whilst delivering value for money by broadening the role of the street warden,. This also ensures that the Council's role as a statutory enforcer through Fixed Penalty Notices meets public expectations, whilst continuing to deliver strategic priorities such as reducing youth crime and maintaining community cohesion.

Accordingly the accompanying report sets out proposals to reconfigure the role of Street Wardens and reshape enforcement services within the Council.

The service review, completed by Matrix has identified three potential options which primarily relate to the reconfiguration of the role of street wardens within the Community Safety Unit. The proposals primarily relate to this service given the fact that they are an onstreet presence with a role to reduce crime, anti-social behaviour and envirocrime in the borough, and they do not presently have a direct enforcement function. The options identified are as follows:

- Option A – No new powers but enhanced efficiency and impact
- Option B - Limited enforcement powers but not the key focus
- Option C - Enforcement Powers given to wardens with key focus

An equality impact assessment is therefore necessary to identify any negative impact the proposed changes may have on the role of the street wardens in addition to identifying future opportunities for the better promotion of equality.

Currently the warden service is aimed at re-assuring the wider community in an attempt to address the issues of crime and the fear of crime. This includes members of the community from all ages, sexes, varying races, religions and beliefs, sexual orientations and disabilities.

The wardens also find themselves engaging with individuals and communities who have come to the attention of personnel due to their own involvement in ASB and enviro-crime. This group whilst not so widely represented also come from all equality groups. Consequently the knowledge of the wardens in tackling issues of diversity and managing conflict is of an extremely high standard.

Wardens also concentrate on engaging with hard to reach groups within the Community, attending community group meetings, OAP clubs, youth groups, religious meetings and lunches. This coupled with their day to day work results in older/elderly people, disabled people, vulnerable people, parents (the majority of whom are women) and unemployed people (a disproportionate number of whom are from ethnic minority groups and/or have a disability) becoming key customers for this service.

Although the warden service does tackle issues relating to harassment/hate crime the wardens do so under the guidance of the Hate Crime Officer and frequently act solely as an information resource.

2. Profile of groups affected as customers and/or staff

2.1.1 Age Equality

Older people especially elderly people are a key target group for this service and joint work with many community groups within the Borough ensures good provision of the service to this group. In addition emphasis is placed on attendance at various events within the Borough targeting both young and old,

frequently bringing these age groups together in events aimed at promoting Community Cohesion.

In addition to the above the service also targets the younger population, providing diversionary activities such as football coaching, and environmental walk-about.

2.1.2 Disability equality

Whilst disabled people are not necessarily a specific key target group for this service, as part of the wider Community the wardens interact on a daily basis with individuals falling into this category. In addition all wardens are aware of the Disability Discrimination Act and all relevant legislation, delivered as part of their extensive training package.

2.1.3 Gender equality

The wardens currently work with all groups within the Community. As a result of their work they attend women's groups and lunches, communicate predominantly with mothers and children at the beginning and end of the school day, interact with both boys and girls through the youth diversionary activities provided, deliver a gym project specifically aimed at encouraging young unemployed males into employment, and work closely with Muslim Elders through their engagement with local mosques.

2.1.4 Race equality

Ethnic minority people are a target group insofar as they form part of the wider community in which the wardens work. Importantly they are also widely represented within the service overall.

Currently the wardens target a wide range of meetings/activities which encompass individuals from various ethnic backgrounds, promoting where possible community cohesion through the provision of organised events. In addition as part of their core function to patrol and target certain wards within the Borough, they come into contact with individuals from different ethnic backgrounds and cultures continuously.

In order to equip the wardens with the necessary tools and understanding of differing cultures they have already undertaken Managing Diversity training, and Equality and Diversity Training.

2.1.5 Religion/Beliefs

The warden service is extremely careful to ensure that all those in the Community, regardless of religion/belief have access to the warden service, and aware of the on-street presence.

2.1.6 Sexual Orientation

This group whilst not a target group for the warden service overall is addressed through the work carried out under the guidance of other colleagues' work in respect of hate crime

2.2 Ethnicity

The table overleaf illustrates the ethnic breakdown of Waltham Forest as a whole:

White	Mixed	Asian or Asian British	Black or Black British	Chinese or other ethnic group
64.5%	3.6%	14.8%	15.4%	1.8%

The following information has been compiled in reference to the 2001 Census:

2.2.1 Age

Total Waltham Forest population: 218,341

2.2.2 Gender

Of the total Waltham Forest population: 51% were Female and 49% were Male

2.2.3 Faith

- 56.8% identified themselves as of the Christian Faith
- 15.1% identified themselves as of the Muslim Faith (3rd largest Muslim community in London)
- 1.8% identified themselves as of the Hindu Faith
- The second largest group answering this question were those who identified no faith/religion, forming 15.3% of all respondents

2.2.4 Street wardens Workforce

The street warden staff group is highly diverse with representatives from varying age ranges, BME communities, various faiths and both males and females. We are therefore fairly confident that the workforce is representative of the wider population as a whole at this time.

3. Questions this assessment addresses

3.1 What kind of equality impact may there be?

It is important to ensure that access to information about any change in service is made available to different groups. Current leaflets are available in a range of community languages, therefore there is the need to ensure that this is addressed, in addition to offering presentations and additional information to harder to reach groups to ensure greater understanding of the changes and what this ultimately means for the Community.

Currently within the warden service there is not a process in place to monitor perpetrators of Anti-social behaviour, and enviro-crime issues addressed by the wardens. There is therefore the need to ensure effective monitoring in relation to the issuing of fixed penalty notices to evidence that there is no adverse impact on any community within the borough.

There is a need to carry out an assessment of the impact in relation to staff issuing fixed penalty notices, ensuring that the training and development of individual staff taking on this role equips them to deal with potentially challenging situations.

There is a need to ensure that individuals from different cultures, and of differing ages work together to promote greater understanding amongst the community better equipping the staff to respond to any potential conflict.

Through the provision of a targeted enforcement service to certain areas of the Borough, the Council needs to consider whether this could be viewed as discriminatory by those living outside of those areas who may wish to benefit from greater enforcement and will not. In comparison, in those areas where enforcement will be concentrated, particularly those falling within the Better Neighbourhood Areas, with greater ethnic diversity the Council needs to consider whether an increased emphasis on enforcement may be viewed as discriminatory to those within. It is therefore essential to ensure adequate education and Consultation with the Communities that will be affected.

With the introduction of enforcement and the change in service, part of the process of re-writing job descriptions and re-grading jobs could result in the numbers of wardens being reduced to accommodate an increase in wages. If this were to be the case, we would need to ensure that the Council maintained a representative workforce throughout and following this process.

With the introduction of enforcement it may be necessary to review the hours which the wardens currently work, altering them to enhance service provision to the optimum. Accordingly if there were to be any changes, the Council would need to take into account how these may affect groups falling into the different equality groups, for example single parents who need to arrange child care.

3.2 How significant is it in terms of its nature and the number of people likely to be affected?

The impact could be significant, however if managed effectively, taking into account the considerations above, the Council hopes this could be greatly reduced particularly by re-visiting the Equalities Impact Assessment after the initial stage of Implementation. In addition it is important to note that the operational focus on street wardens using enforcement powers will not be at

the expense of existing functions in relation to youth diversion, community reassurance and engagement.

3.3 Is the impact positive or negative (or is there a potential for both)?

There is a potential for both positive and negative impact.

3.4 On what aspects of the Equality Duties will this impact be?

This could possibly impact mostly on gender and race as a result of the changes in service provision and the potential for conflict towards staff. In addition it could impact certain groups within society more so than others if not managed and monitored effectively through the collection of data.

3.5 Could the impact constitute unlawful discrimination?

No. As the service is already accessed by the wider Community any potential problems are not insurmountable. It is however important to re-visit the Equalities Impact Assessment if the warden role changes to ensure that the impact is not greater than currently envisaged, and processes are managed and implemented effectively.

3.6 What further information is required to gauge the probability and extent of the impact?

None at this stage as further research will need to be completed if Option 3 is implemented. An ideal time to do so would be following the implementation of Phase 1, prior to the implementation of Phase 2. This will enable any concerns raised, to be addressed prior to further expansion of the role of enforcement.

3.7 Where and how can that information be obtained?

This is not applicable at this stage.

4. Action Planning Questions

4.1 What action do we need to take to reduce negative impact?

A targeted information campaign needs to be developed with a clear focus on the provision of accessible information and on information and advice that is relevant to the Community as a whole. Attention should be paid to hard to reach groups within the Community.

In order to comply with the Race Relations Amendment Act 2000 and the LBWF extended requirements to capture data, a robust process of gathering information must be established so that actual and potential inequalities are identified in relation to the issuing of fixed penalty notices to evidence that there is no adverse impact on any community within the borough.

An assessment measuring the impact on staff who are issuing fixed penalty notices should be carried throughout the implementation of Phase 1.

Those staff who have not already received training in Managing Diversity and Managing Conflict should do so prior to the introduction of Enforcement ensuring they are adequately equipped with the necessary tools to manage potentially difficult situations.

Following the implementation of Phase 1 the community should be consulted to gauge overall perception, monitor the effectiveness of the change in role and improve delivery of service through consecutive phases.

If there is a need to reduce the number of Officers HR will need to be consulted on the how best to ensure the service maintains a level of representation through a fair and equal process.

If there is a need to alter the hours of operation, the potential impact to service provision must be considered prior to implementation, considering the likelihood of flexible working arrangements to accommodate those most affected.

4.2 If the action proposed will not fully mitigate adverse consequences for equality, or if the decision is to take no action, why is this, and can we justify it?

This action will mitigate the adverse effects of the proposed service delivery.

4.3 Do we need to undertake any further consultation or research?

Yes – the results of the activity proposed in this action needs to be monitored and reviewed after the initial implementation, in addition to further community consultation of those within Phase 1.

4. Conclusions and Next Steps

4.1 The key areas, which need to be improved as a result of this assessment, are:

Action Plan

Action required	Lead Officer	Time Scale	Comments/Outcomes
The development and	Michelle	Starts	

implementation of a targeted information campaign/presentations to hard to reach groups	Bridge	in Sept 2007	
Introduce an effective monitoring system in relation to the issuing of fixed penalty notices	Michelle Bridge	Sept 2007	
Introduce an assessment to measure the impact on staff following issuing of FPN's	Michelle Bridge	Sept 2007	
Train the staff to equip them with relevant skills and knowledge	Michelle Bridge	Starts in Aug 2007	
Carry out Community Consultation following phase 1 to gauge public perception	Michelle Bridge	Starts in Dec 2007	
Consult with HR regarding possible reduction in staff numbers, flexible working arrangements and ensuring necessary processes are followed	Michelle Bridge/Si an Hasler	Starts in Jun 2007	