

Impact Assessment Report

1 Summary /Recommendations

- 1.1 The assessments identified that the lead officer is keen to develop equalities within the services and a number of opportunities have been highlighted. An action plan for improvement can be found in [appendix A](#).
- 1.2 The team should work closely with the Equalities and Inclusion Officer to identify and implement good practise in development and delivery of the policy to ensure that a positive impact can be obtained for all groups.
- 1.3 Future assessments could improved by in addition to following corporate guidance implementing the following:
 - Interviewing staff at all levels to gain further information and evidence
 - Review of processes and impact on service delivery, not only policy documentation
 - Introduction of an assessment panel to analyse, review and monitor policy, procedures and service delivery.

2 Background

- 2.1 The equality standard exists to ensure that authorities address Race, Gender and Disability at all levels of Council policy and practise. As part of the standard Council's must carry out equality impact assessments on proposed policies.
- 2.2 CPS have introduced three statutory policies required annually and have undergone initial equality impact assessment. These are:
 - **Health and Safety Service Delivery Plan 2003/4**
 - **Trading Standards Service delivery plan 2003/4**
 - **Food Law enforcement service plan 2003/4**

3 Process of Equality Impact Assessment

- 3.1 In order to carry out the Equality Impact Assessment corporate guidance was adhered to and the following activities were carried out:
 - Meetings with the lead officer, Garry Seal
 - Equality and Diversity Awareness checklist completed (Appendix B)
 - Equality Impact Assessment Forms completed for each policy. (Appendix C,D and E)
 - Analyses of the plans and evidence against good practise indicators. (Appendix, F, G and H)

- 3.2 Further evidence to conclude the assessment was requested and evidence obtained can be found in appendix I.
- 3.3 Each policy is given a star rating from 1-5, where 5 is the best. The rating is based on their assessment against the five good practice indicators.

4 Assessment Outcomes

Outcomes generic to all plans

- 4.1 The plans do not unlawfully discriminate or have an adverse impact against any of the groups assessed, however, more work could be done to promote race equality and diversity.
- 4.2 The lead officer is keen to integrate equalities into service delivery but needs guidance on practical solutions.
- 4.3 Consultation was limited and at the time of the assessment had not been analysed, except for some analysis within the Trading Standards Plan therefore specific needs of groups are not taken into account in development of the policy/plans.
- 4.4 The assessment identifies that more work could be done to ensure a positive impact, for example:
 - Audit trails of where equalities have been considered
 - Audit trails of consultation, e.g. advised that policy drawn up in consultation with staff but no evidence.
 - Analysis of available data such as Census information.
 - A review of service delivery identifying practical ways in which improvements can be made to ensure equality
 - Analysis of consultation by ethnicity incorporated into the plans
 - Monitoring of positive action, e.g. use of interpreters monitored by ethnicity, those who having taken up the opportunity for training.

Trading Standards Plan

- 4.5 The lead officer believed that the policy has a positive impact in two areas:
 - People from particular ethnic communities e.g. Extra support and interpreters provided
 - People with learning difficulties as the policy is available to protect vulnerable people
- 4.6 Although, consultation was carried out and evaluated and the Borough profile used within the policy insufficient evidence and information was available to agree that the policy has a positive impact in the above

areas, and therefore the **assessment outcome is neutral with a 2**rating.**

4.7 The assessment identified that more work could be done to improve the policy in relation to equality including:

- Identify whether consultation reaches out to all service users e.g. Does user survey respondents reflect service users e.g. 66% of respondents are white. Consider using a minimum of two methods of consultation, i.e. a method to reach all users and a further method to reach targeted groups.
- Identify how service can be improved for customers whose first language is not English, e.g. 56% of customers want to access the service by phone, monitoring of translation services to be undertaken.
- Develop integrated implementation plan with SMART targets to include recommendations developed from the residents panel and current and planned action stated. All initiatives to be considered on an equality basis, e.g. Consider whether self help packs to be made available in languages other than English.

Health and safety Service Delivery Plan

4.8 The lead officer believed that the policy has a positive impact in four areas:

- People from particular ethnic communities e.g. Extra support and interpreters provided
- All people with disabilities, assessment takes account of people with disabilities
- People with particular disabilities, assessment takes account of access therefore has a positive impact on wheelchair users.
- People with particular illnesses, e.g. considering hazardous substances and impact on asthma sufferers.

4.9 However, the assessment highlights insufficient information and evidence available to agree a positive impact, the outcome of the assessment is that the policy has a **neutral impact and 2 **rating.**

4.10 The assessment identifies that more work could be done to ensure a positive impact, for example:

- Follow up and evaluation of consultation with Black Business Association
- Disability considered within Social Justice section, additional consideration could be given to asylum seekers working illegally and Health and Safety issues.
- Evaluation of impact of activities, e.g. what percentage of caterers who signed up for the Food Award scheme are from BME groups.
- Pro-forma's used for sampling inspections need to be considered for equalities

Food Law Enforcement Plan

4.11 The officer believed the plan had a positive impact on 3 groups:

- People from particular ethnic communities, extra support given, e.g., training provided in food hygiene, also interpreters used where appropriate
- People with learning difficulties, training provided for high risk groups and for people who have difficulty understanding hygiene issues
- People with particular illnesses, policy exists to ensure the protection of people's health

4.12 However, the assessment highlights insufficient information and evidence available to agree a positive impact, the outcome of the assessment is that the policy has a **neutral impact and 2** rating**.

4.13 Examples where more consideration could have been given could include:

- Assessment of the ethnic makeup of residents and visitors reached during Food Safety week and caterers signing up to the food award scheme could be undertaken
- Follow up to consultation with Black Business association and Asian Business Association could have been undertaken
- Further assessment broken down into ethnicity of proprietors and employees in the food business required
- Analysis of the best way to reach peoples needs if English is not the first language. (Policy states SLA with WFITS)

Appendices

Proposed Action Plan – Appendix A

Equality and Diversity Checklist – Appendix B

Impact Assessment Pro-forma

Health and Safety Plan – Appendix C
Trading Standards Plan – Appendix D
Food Law Enforcement – Appendix E

Analysis against good practise indicators:

Health and Safety Plan – Appendix F
Trading Standards Plan – Appendix G
Food Law Enforcement Plan – Appendix H

Addition evidence - Appendix I

Appendix F

Health and Safety Service Delivery Plan 2003/4 – Impact Assessment

Good practise indicators

1) That the lead officer has actively considered equalities

- There is insufficient evidence to agree that equalities have been considered in the development of the policy.
- Social Justice implications are within the report but only in relation to disability. Analysis is required on the impact of Health and Safety on specific groups, e.g. asylum seekers working illegally.
- The lead officer advised that staff had been consulted but evidence not available
- Consultation with service users has not been analysed
- Evidence of use of translators is patchy
- Evidence on how the policy has a positive impact on people with disabilities not available

2) That the lead officer has a good general awareness of E&D issues.

- The lead officer has received training in equality issues and equality impact assessments and is aware of relevant data. However the use of available information has been limited.
- Monitoring information on service users is unavailable.
- The lead officer is committed to equalities but needs guidance in the practical application.

3) That the policy has a neutral or positive impact on different parts of the community.

- The EIA has been completed see appendix C
- There is a lack of evidence to corroborate the claim that the policy has a positive impact.
- Consultation carried out with Black Business Association, the Asian Business Association but results not analysed.

4) That the lead officer can make an informed judgement on whether the policy has a differential impact?

- The lack of consultation analyses and monitoring information and evidence means that the officer cannot make an informed judgement.
- Consultation with stakeholders has occurred but has not yet been analysed.

5) That the lead officer has addressed the need for continuous monitoring information to check that there is no unforeseen adverse affect.

- The document does not incorporate how the plan will be monitored.

Appendix G

Trading Standard Service Delivery Plan 2003/4 – Impact Assessment

Good practise indicators

1) That the lead officer has actively considered equalities

- There is insufficient evidence to agree that equalities have been considered in the development of the policy.
- Analysis is required on the impact of Trading Standards on specific groups
- Evidence of staff consultation is not available
- Meaningful information relating to the use of translators is not available

2) That the lead officer has a good general awareness of E&D issues.

- The lead officer has received training in equality issues and equality impact assessments and is aware of relevant data. However the use of available information has been limited.
- Monitoring information on service users is unavailable.
- The lead officer is committed to equalities but needs guidance in the practical application.

3) That the policy has a neutral or positive impact on different parts of the community.

- Th EIA has been completed see appendix D
- There is a lack of evidence to corroborate the claim that the policy has a positive impact.

4) That the lead officer can make an informed judgement on whether the policy has a differential impact?

- The lack of consultation analyses and monitoring information and evidence means that the officer cannot make an informed judgement.
- Consultation with stakeholders has occurred but has not yet been analysed.

5) That the lead officer has addressed the need for continuous monitoring information to check that there is no unforeseen adverse affect.

- The document highlights how performance will be reviewed against the service delivery plan but could be improved by addressing the impact on specific groups.

Appendix H

Food Law Enforcement Service Delivery Plan 2003/4 – Impact Assessment

Good practise indicators

1) That the lead officer has actively considered equalities

- There is insufficient evidence to agree that equalities have been considered in the development of the policy.
- Consultation was carried out with Black Business Groups and the Asian Business Association but not analysed.
- Social justice paragraph identifies that Black and Minority ethnic groups are highly represented amongst proprietors but appears to be a one off statement.
- Borough profile used in the assessment but links to pre 2001 Census.
- The plan highlights that 60% of business proprietors have English as their second language and that Service Level Agreement with WFITS will be maintained.
- Food safety week, impact on BEM groups could be addressed
- Evidence of staff consultation not available
- Meaningful information relating to translators not available

2) That the lead officer has a good general awareness of E&D issues.

- The lead officer has received training in equality issues and equality impact assessments and is aware of relevant data. However the use of available information has been limited.
- Monitoring information on service users is unavailable.
- The lead officer is committed to equalities but needs guidance in the practical application.

3) That the policy has a neutral or positive impact on different parts of the community.

- Th EIA has been completed see appendix E
- There is a lack of evidence to corroborate the claim that the policy has a positive impact.

4) That the lead officer can make an informed judgement on whether the policy has a differential impact?

- The lack of consultation analyses and monitoring information and evidence means that the officer cannot make an informed judgement.
- Consultation with stakeholders has occurred but has not yet been analysed.

5) That the lead officer has addressed the need for continuous motoring information to check that there is no unforeseen adverse affect.

- Not documented