

EQUALITY IMPACT ASSESSMENT FORM

October 2018

THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion, Belief or Non-Belief
- Sex
- Sexual Orientation
- Welsh Language*

* The Welsh language is not identified as a protected characteristic under the Equality Act 2010, however in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

Further advice on completing impact assessments can be found on the equalities pages of Corporate Policy Unit Portal.

THE EQUALITY IMPACT ASSESSMENT

NAME OF NEW OR REVISED PROPOSAL *	Deletion of post within Trading Standards Service
DIRECTORATE	Communities
SERVICE AREA	Public Protection
CONTACT OFFICER	Jacqui Morgan
DATE FOR NEXT REVIEW OR REVISION	

***Throughout this Equalities Impact Assessment Form, ‘proposal’ is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.**

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities and Welsh Language issues have been proactively considered throughout the decision making processes governing work undertaken by every service area in the Council as well as work done at a corporate level.

The Council’s work across Equalities, Welsh Language and Human Rights is covered in more detail through the [Equalities and Welsh Language Objectives and Action Plan 2016-2020](#).

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the [Corporate Policy Unit Portal](#) and the Council’s Equalities and Welsh Language team can provide advice as the EIA is being developed. Please note that the team does not write EIAs on behalf of service areas, the support offered is in the form of advice, suggestions and in effect, quality control.

Contact equalities@caerphilly.gov.uk for assistance.

PURPOSE OF THE PROPOSAL

1	<p>What is the proposal intended to achieve? <i>(Please give a brief description and outline the purpose of the new or updated proposal by way of introduction.)</i></p> <p>The proposal intends to achieve a salary saving within the Trading standards service by deletion of a post from the structure as a contribution to the MTFP. The Trading Standards Service is a statutory regulatory service with limited opportunities for income generation. There are two Trading Standards teams with a total of 17 posts equating to 16 FTEs across two teams.</p> <p>A budget realignment has already been taken in 18/19. There are no further options for significant budget savings other than salaries/vacancy management.</p>
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2	<p>Who are the service users affected by the proposal? <i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc. Are there any data gaps?)</i></p> <p>The service covers a wide variety of functions including Food and Product safety, Doorstep Crime, Animal Health and Welfare, Under Age Sales, Fair Trading, Consumer Advice and Intervention and Licensing Enforcement. Consumers, businesses and staff will be affected by the loss of a post. Staff members within the service will also feel the impact and work programs will need to be amended in future years to reflect the reduction in capacity.</p>
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IMPACT ON THE PUBLIC AND STAFF

3	<p>Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals? <i>(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)</i></p> <p>All service users have equal access to the service. Trading Standards ensure that it treats all service users, individuals and organisations, as efficiently and comprehensibly as possible and with respect. The deletion of the post will inevitably impact on service provision and response times for dealing with operational issues but these will apply equally to all service users. Dynamic assessments will however be applied to serious matters involving public safety or vulnerable persons.</p>
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4 **Is your proposal going to affect any people or groups of people with protected characteristics?**
(Has the service delivery been examined to assess if there is any indirect effect on any groups? Could the consequences of the policy or savings proposal differ dependent upon people's protected characteristics?)

Protected Characteristic	Positive, Negative, Neutral	Relevance of the Policy or Practice
Age	Neutral	The reduction in staffing will mean that service delivery will have to be further prioritised. The service does respond to rogue trader incidents which are mainly targeted at the elderly and vulnerable, administer No Cold Calling Zones across the borough. Conversely work on underage sales advice and test purchase exercises are aimed at protecting young people from harm as well as communities.
Disability	Neutral	
Gender Reassignment	Neutral	
Marriage & Civil Partnership	Neutral	
Pregnancy and Maternity	Neutral	
Race	Neutral	
Religion & Belief	Neutral	
Sex	Neutral	
Sexual Orientation	Neutral	

5 **In line with the requirements of the Welsh Language Standards. (No.1) Regulations 2015, please note below what effects, if any (whether positive or adverse), the proposal would have on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.**
(The specific Policy Making Standards requirements are Standard numbers 88, 89, 90, 91, 92 and 93. The full detail of each Standard is available on the Corporate Policy Unit Portal. Although it is important that what is outlined in the proposal is available in Welsh and English, please consider wider impacts on Welsh speakers.)

There are no impacts on the Welsh Standards as result of the proposal.

INFORMATION COLLECTION

6	<p>Please outline any evidence and / or research you have collected which supports the proposal? This can include an analysis of service users. <i>(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more protected characteristic groups? If so, what has been done to address any difference in take up of the service? Does any savings proposal include an analysis of those affected?)</i></p> <p>Trading Standards is so wide ranging it has many different types of service users. Officers provide advice and assistance to consumers who have problems with goods and services purchased. They give advice and guidance to businesses to assist them to comply with legislation and compete in a fair market place. Enforcement action is also taken where appropriate for non-compliances.</p>
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CONSULTATION

7	<p>Please outline the consultation / engagement process and outline any key findings. <i>(Include method of consultation, objectives and target audience. What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have you referred to the Equalities Consultation and Monitoring Guidance?)</i></p> <p>The service carries out customer satisfaction surveys of customers accessing consumer advice and businesses inspected by officers for compliance with the law. Satisfaction levels are reported annually and comments considered for any improvements required to service provision.</p> <p>The service is equally available to all. Home visits are available for persons seeking consumer advice who are not able to attend the office. We do not have any data indicating different levels of take up by types of service users. The majority of the function is regulatory and enforcement based and applies equally to everyone with mechanisms in place for persons who may need additional support such as translation services, signing for the deaf etc. The service does not hold a breakdown of the service users based on people's disability, race, gender, sexuality, age, language, and religion/belief.</p> <p>The proposal to delete a post from the Trading Standards structure will be considered as part of the CCBC Budget Engagement Activity Plan 2019/20. Proposals will be considered by Cabinet, Members in a specific seminar on the MTFP, Special scrutiny meetings and as part of the Public engagement period November to January. Full Council will decide the final outcome after consideration of feedback from the whole process.</p>
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MONITORING AND REVIEW

8	<p>How will the proposal be monitored? <i>(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)</i></p> <p>Performance will be monitored to assess the impact of loss of a post. Responses to consumer and business satisfaction surveys will be compared with earlier years for any changes , comments etc. Response times when dealing with consumer complaints, service requests and complaints received about service provision will also be monitored.</p> <p>The service also compiles statistics annually on performance against targets for key indicators and a risk assessed inspection programme. The latter is externally monitored and audited for Food Standards and Regional Feed inspections.</p>
9	<p>How will the monitoring be evaluated? <i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>See 8 above which will include consumers and business. Responses to requests from other agencies, joint working etc. will also be monitored.</p>
10	<p>Have any support / guidance / training requirements been identified? <i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equalities or Welsh Language training of some sort?)</i></p> <p>Team leaders within the service have had the opportunity to attend EIA training sessions.</p>
11	<p>If any adverse impact has been identified, please outline any mitigation action.</p> <p>As detailed above service delivery will be prioritised according to risk and service performance and feedback mechanisms will be monitored to assess the impact on the service and its users and stakeholders.</p>
12	<p>What wider use will you make of this Equality Impact Assessment? <i>(What use will you make of this document i.e. as a consultation response, appendix to approval reports, publicity etc. in addition to the mandatory action shown below?)</i></p> <p>This EIA will be published on the CCBC website and as part of the MTFP engagement process.</p>

13	If any adverse impact has been identified, please outline any mitigation actions. See 11 above
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14	<p>An equality impact assessment may have four possible outcomes, through more than one may apply to a single proposal. Please indicate the relevant outcome(s) of the impact assessment below.</p> <p style="text-align: right;">Please tick as appropriate:</p> <p>No major change – the impact assessment demonstrated that the proposal was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <input checked="" type="checkbox"/></p> <p>Adjust the proposal – the impact assessment identified potential problems or missed opportunities. The proposal was adjusted to remove barriers or better promote equality. <input type="checkbox"/></p> <p>Continue the proposal – the impact assessment identified the potential problems or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant proposals.) <input type="checkbox"/></p> <p>Stop and remove the proposal – the impact assessment identified actual or potential unlawful discrimination. The proposal was stopped and removed, or changed. <input type="checkbox"/></p>
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Completed by:	Jacqui Morgan
Date:	29/10/18
Position:	Group Manager
Name of Head of Service:	Robert Hartshorn