

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 *	Increase Registration Service Ceremony Fees on a cost recovery basis.
DIRECTORATE	Communities
SERVICE AREA	Public Protection
CONTACT OFFICER	Jacqui Morgan
DATE FOR NEXT REVIEW OR REVISION	Fee review 2020/21

***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>Ceremony fees are reviewed annually to recover reasonable costs of providing the service. The review of fees charged, involves consideration of the cost to the authority in providing the service and comparing fees set by neighbouring and other Welsh authorities. Some fees are set centrally by the General Register Office, others such as Ceremony fees can be determined locally in order to recover the cost of providing that particular service. The proposal is to increase these fees accordingly in an effort to cover costs.</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 proposal will affect persons booking Marriage and Civil Partnership ceremonies and will apply equally to everyone.</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>Fees apply across the board to everyone. Arrangements exist for home visits for taking of notice and conducting of ceremonies where circumstances prevent persons attending the register office or ceremony rooms. Fees for those special circumstances are set nationally by the Registrar General. For marriage/civil partnership, couples are required to give notice in the district where they live. The</p>
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notice fee is also set centrally by the Registrar General and so applies to all.

Once notice has been given and approval to marry received, couples may have the ceremony in another district if they wish. Some choose religious premises others opt for civil ceremonies. Legislation changed in 2014 to enable Same Sex Marriage in addition to Civil Partnerships. The service has promoted the ability to choose either option on its web site and in various press releases. Same Sex couples contacting the service are made aware of the options open to them. .

Legislation in England and Wales requires all processes to be through the medium of Welsh or English but we provide opportunities for all using various forms of support through the processes. Where there is a language requirement we provide it. We have Welsh speakers available for all aspects of the service; a British Sign Language (BSL) support officer for hearing or speech impaired people, and would hire foreign language interpreters where necessary.

4	Is your proposal going to affect any people or groups of people with protected characteristics? <i>(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?)</i>	
Protected Characteristic	Positive, Negative, Neutral	Relevance of the Policy or Practice
Age	Neutral	
Disability	Neutral	
Gender Reassignment	Neutral	
Marriage & Civil Partnership	Negative	Increased fees will impact on couples booking ceremonies but these are "one off" or rare events that do not have ongoing effects on the public and so will have low impact. Fees are based on cost recovery not profit.
Pregnancy and Maternity	Neutral	
Race	Neutral	
Religion & Belief	Neutral	
Sex	Neutral	
Sexual Orientation	Neutral	Fees are the same for marriage and civil partnership ceremonies.

5	<p>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.</p> <p><i>(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.)</i></p> <p>None. We have Welsh speakers available for all aspects of the service.</p>
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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>Fees have been assessed in relation to the cost of providing the service at the CCBC premise and other externally licensed venues. Fees are also benchmarked against other districts in Wales and nearest neighbours as there is a risk that increases could deter couples from booking ceremonies in our area in our own Penallta House ceremony room and external licenced venues. The proposed fees are generally based on cost recovery and are still competitive when compared with our nearest neighbours.</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 every year encouraging all ceremony and other customers to give feedback and rate the service provided. Officers would also note any queries or complaints about cost if they occurred on the system.</p> <p>The Service developed an Engagement Strategy in 2017 which is published on the website and more recently developed additional feedback options on the website.</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>
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	<p>Members of the public are required by law to register a birth, death or marriage where it occurs and to give legal notice based on residence so nobody could be precluded as a potential user of the service.</p> <p>The service deals with a large number of customers from all ethnic backgrounds, of all ages and with various needs either due to disability or language but other than the information recorded through the response to customer surveys, Registrars do not monitor those various elements.</p> <p>The service will monitor feedback comments and responses to customer satisfaction surveys.</p>
<p>9</p>	<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>All service users are encouraged to give feedback after using the service. Visitors to the CCBC Registration Service web pages also have the opportunity to give feedback after visiting the site.</p>
<p>10</p>	<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>No, Service Manager has attended EIA training. Equalities training and awareness is a core part of service provision in this area. Welsh language, BSL and other language provision are all currently catered for .</p>
<p>11</p>	<p>If any adverse impact has been identified, please outline any mitigation action.</p> <p>The fees apply to everyone and so would not have consequences for specific groups. Comparisons with neighbouring and other districts in Wales indicate that the proposed fees are reasonable. Fees are for “one off” or rare events that have low impact on users in the long term. The authority is also required to provide a statutory ceremony (for marriage and civil partnership) at a centrally set fee, currently £46</p>

	<p>Numbers of ceremonies are recorded each year so any perceived change in numbers as a result of fee increases could be monitored.</p>
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12	<p>What wider use will you make of this Equality Impact Assessment?</p>
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	<p><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>
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	<p>The EIA will be published as part of the 2019/20 Budget Engagement plan and could be included in the Registration Services annual plan.</p>
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13	<p>If any adverse impact has been identified, please outline any mitigation actions.</p> <p>See 11 above.</p>
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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