

# 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                            | • Race                           |
| • Disability                     | • Religion, Belief or Non-Belief |
| • Gender Re-assignment           | • Sex                            |
| • Marriage and Civil Partnership | • Sexual Orientation             |
| • Pregnancy and Maternity        | • 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

<b>NAME OF NEW OR REVISED PROPOSAL*</b>	Introduction of charges for rat treatments £20k
<b>DIRECTORATE</b>	
<b>SERVICE AREA</b>	Public Protection – Environmental Health
<b>CONTACT OFFICER</b>	Ceri Edwards
<b>DATE FOR NEXT REVIEW OR REVISION</b>	

**\*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](mailto:equalities@caerphilly.gov.uk) for assistance.

## PURPOSE OF THE PROPOSAL

<b>1</b>	<p><b>What is the proposal intended to achieve?</b> <b>Introduction of a £20 charge for rat treatments to generate £20k income</b></p> <p>Rat treatments in domestic premises are currently undertaken free of charge.</p> <p>The public would have to pay for pest control services such as rats within domestic premises. At current volumes of circa 3,300 calls per year for rats, a £20 charge would generate annual income of £66,000. However, experience from neighbouring authorities has demonstrated that following the introduction of such charges there has subsequently been a significant decline in the number of service requests processed of up to 61%. A fall in the number of service requests is therefore anticipated as a result of the introduction of a charge. Net increased income is therefore estimated to be £26,000 (based on a 61% reduction in calls).</p> <p>There is some risk of public health implications due to infestations left untreated, particularly impacting on low-income households. Members of the public may try to undertake treatments themselves which can lead to the improper placing of rodenticides and expose non target species to risk.</p> <p>There is also an additional risk that if the income target is not realised. The equivalent amount of money will need to be found from elsewhere in the budget and may ultimately impact on the number of posts within the team.</p> <p>Experience from neighbouring authorities has also demonstrated that the introduction of charging and a decline in service uptake has created an increase to the workload of environmental health officers as they have to investigate the cause of rat infestations, neighbour disputes, and to take enforcement action to remedy problems, including the service of notices and undertaking works in default. Some members of our communities will be unable to fund the treatment, resulting in untreated problems that may give rise to public health issues.</p> <p>In addition we would advise that one comparative valley authority have now re-instated their free service due to the increase in public health concerns, and a second is also giving this due consideration. Aside from Caerphilly, of the other Local Authorities in Wales 6 provide a free treatment for rats, 10 do so for a charge, and 5 provide no pest control service at all.</p> <p>Some pest control infestations are often complicated, and time consuming to investigate and remedy; the proposed £20 charge by no means meets the cost of providing the service and so there would continue to be a level of subsidy in providing this service.</p>
<b>2</b>	<p><b>Who are the service users affected by the proposal?</b></p> <p>The team deals with excess of 5,000 service requests for pest control per year, including approximately 3,300 for rats. Service users may include any resident within the county, school and some private sector groups.</p> <p>An introduction of a £20 (plus VAT) charge for rat treatments will inevitably have an impact for service users including the public generally, vulnerable individuals and</p>

	those on lower incomes although for those in receipt of relevant benefits the charge is £10 (plus VAT).
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## IMPACT ON THE PUBLIC AND STAFF

<b>3</b>	<p><b>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?</b></p> <p>All service users have equal access to the service. Environmental Health ensures that it treats all service users, individuals and organisations, as efficiently and comprehensibly as possible and with respect. However, some members of our communities may be unable to fund such treatment, resulting in untreated problems that may give rise to public health issues.</p> <p>Rat treatments in domestic premises are currently undertaken free of charge. It is proposed to introduce a £20 (plus VAT) charge. Customers in receipt of means tested Universal Credit or Guaranteed Pension Credit receive a 50% discount on the Council's Pest Control charges and so would pay £10 (plus VAT).</p> <p><b><u>Actions required</u></b></p> <p>Consideration will need to be afforded to imposing a concessionary charge for individuals in receipt of means tested universal credit or guaranteed pensions credit .</p>
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<b>4</b>	<p><b>Is your proposal going to affect any people or groups of people with protected characteristics?</b>  <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></p>
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Protected Characteristic	Positive, Negative, Neutral	Relevance of the Policy or Practice
Age	Neutral	This proposed change would apply equally to all service users. Customers in receipt of means tested Universal Credit or Guaranteed Pension Credit receive a 50% discount on the Council's Pest Control charges
Disability	Neutral	
Gender Reassignment	Neutral	
Marriage & Civil Partnership	Neutral	
Pregnancy and Maternity	Neutral	
Race	Neutral	
Religion & Belief	Neutral	

<b>Sex</b>	<b>Neutral</b>
<b>Sexual Orientation</b>	<b>Neutral</b>

<b>5</b>	<p><b>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.</b></p> <p>The proposals do not impact on the use of the Welsh language.</p>
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## INFORMATION COLLECTION

<b>6</b>	<p><b>Please outline any evidence and / or research you have collected which supports the proposal? This can include an analysis of service users.</b></p> <p>Information has been received from Welsh Authorities which has indicated a decline in service uptake as result of the implementation of a charging regime for rats. No analysis of service users has been collated</p>
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## CONSULTATION

<b>7</b>	<p><b>Please outline the consultation / engagement process and outline any key findings.</b></p> <p>The proposal was included in a report to Cabinet on the 14<sup>th</sup> November 2018; therefore publicly available. The Equalities team were consulted on the report.</p>
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## MONITORING AND REVIEW

<b>8</b>	<p><b>How will the proposal be monitored?</b></p> <p>Environmental Health monitors the numbers of service requests it receives, together with performance data; this practice will continue.</p> <p>In addition a comparison on number of request made to the Environmental Health General team will be undertaken to see whether there is an increase in call numbers in this area as a result of requests on neighbouring properties.</p> <p>Environmental Health follows the corporate complaints procedure for logging and investigating any complaints.</p>
<b>9</b>	<p><b>How will the monitoring be evaluated?</b></p>

	Service request data and corporate complaint data will be monitored to assess detrimental impacts
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<b>10</b>	<b>Have any support / guidance / training requirements been identified?</b> Training will be provided if identified and deemed to be necessary.
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<b>11</b>	<b>If any adverse impact has been identified, please outline any mitigation action.</b> Training will be provided if necessary.
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<b>12</b>	<b>What wider use will you make of this Equality Impact Assessment?</b> This EIA will be used as supporting evidence in the decisions being made around the savings proposals
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<b>13</b>	<b>If any adverse impact has been identified, please outline any mitigation actions.</b> Consideration will need to be afforded to imposing a concessionary charge for individuals in receipt of means tested universal credit or guaranteed pensions credit .
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<b>14</b>	<p><b>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.</b></p> <p style="text-align: right;"><b>Please tick as appropriate:</b></p> <p><b>No major change</b> – 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><b>Adjust the proposal</b> – 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><b>Continue the proposal</b> – 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><b>Stop and remove the proposal</b> – 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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<b>Completed by:</b>	CERI EDWARDS
<b>Date:</b>	2/11/2018
<b>Position:</b>	ENVIRONMENTAL HEALTH MANAGER
<b>Name of Head of Service:</b>	ROBERT HARTSHORN