

# EQUALITY IMPACT ASSESSMENT FORM

July 2019

## 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.

EIAs are a legal requirement under equalities legislation (Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011) where the potential for a significant negative impact has been identified. This legislation has been in place since 2000. We also have a legislative duty 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.

## THE EQUALITY IMPACT ASSESSMENT

<b>NAME OF NEW OR REVISED PROPOSAL *</b>	Merge Community Safety Wardens with the Environmental Health General Enforcement Team.
<b>DIRECTORATE</b>	Communities
<b>SERVICE AREA</b>	Public Protection Division- Community Safety
<b>CONTACT OFFICER</b>	Ceri Edwards – Environmental Health Manager
<b>DATE FOR NEXT REVIEW OR REVISION</b>	Following the Council Budget Setting Meeting

**\*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> <i>(Please give a brief description and outline the purpose of the new or updated proposal by way of introduction.)</i></p> <p>This proposal intends to achieve a £160,000 saving by deleting three fixed term Community Safety Warden posts and one vacant permanent post. Two permanent posts will be merged into the General Enforcement Team in Environmental Health who undertake littering, dog fouling, and flytipping enforcement work.</p>
<b>2</b>	<p><b>Who are the service users affected by the proposal?</b> <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 provides a uniformed patrolling presence in communities dealing with low level crime and anti-social behaviour. Each officer is authorised by the Chief Constable of Gwent Police with powers that include traffic management and the issue of Police penalty notices. The service works very closely with the local Neighbourhood Policing Teams tackling issues in communities ranging from youth annoyance and disorder, persons under the influence of substances, enviro crime issues, defects in infrastructure, dog fouling and littering etc. As Neighbourhood Policing Teams are being depleted the service is increasingly the first line of response.</p> <p>Earlier shifts tend to be involved in the community engagement element of the role as much as in enforcement. In particular, visiting local residents to discuss complaints around anti-social behaviour, enviro-crime issues and community events with partners, and issues in town centres such as street drinking etc.</p> <p>Weekend (Friday and Saturday only) shifts deal more with youth annoyance and disorder and street drinking. As well as supporting high profile events across the borough such as The Big Cheese and Remembrance Day parades/services; these events would require increased reliance on stewards in future.</p> <p>For the 2018-2019 Financial Year the Community Safety Warden Service carried out 3924 patrols. Words of advice to persons acting contrary to acceptable standards of behaviour were given on 587 occasions. There were 548 interactions with Council Members via meetings, phone calls etc. Formal verbal warnings were given on 35 occasions. 78 items of alcohol were confiscated and 27 referrals for Anti-social behaviour Injunction consideration were made. 332 referrals were made to other departments/agencies to resolve problems in communities.</p> <p>The service was reduced from 9.5 fte to 6 fte to achieve financial savings in the 2019/20 budget setting process. As a result of the staffing reduction the service was reconfigured from April 2019 with a change in shift pattern, coverage, and a prioritisation of reactive work over routine patrols and community engagement.</p> <p>The service users affected will differ depending on the nature of their involvement with the team. Residents in general will be affected by the proposals and in particular those impacted by anti-social behaviour.</p>

## IMPACT ON THE PUBLIC AND STAFF

<p><b>3</b></p>	<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>  <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>The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of anti-social behaviour or hate crime associated with sexual orientation..</p>	
<p><b>4</b></p>	<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>	
<p><b>Protected Characteristic</b></p>	<p><b>Positive, Negative, Neutral</b></p>	<p><b>What will the impact be? If the impact is negative how can it be mitigated?</b></p>
<p><b>Age</b></p>	<p>Negative</p>	<p>The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to those with protected characteristics. E.g. by assisting older people with road closure arrangements during Remembrance Day Events. E.g. by intervening where cases of anti-social behaviour that impact on older people. CSWs provide a high profile uniformed presence in our communities and can be perceived as a role model by some young people thereby promoting positive behaviours.</p>
<p><b>Disability</b></p>	<p>Negative</p>	<p>The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of anti-social/hate behaviour that impact on disabled people.</p>
<p><b>Gender Reassignment</b></p>	<p>Negative</p>	<p>The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. They also provide patrols and visits for those at threat of hate crimes including trans-gender people.</p>
<p><b>Marriage &amp; Civil Partnership</b></p>	<p>Negative</p>	<p>The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of</p>

		anti-social/hate behaviour that impact on same sex partnerships.
<b>Pregnancy and Maternity</b>	Neutral	
<b>Race</b>	Negative	The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of anti-social behaviour and hate crime associated with racial abuse.
<b>Religion &amp; Belief</b>	Negative	The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of anti-social behaviour and hate crime associated with religious beliefs.
<b>Sex</b>	Neutral	
<b>Sexual Orientation</b>	Negative	The CSWs are tasked with providing re-assurance and protection to every member of society; however they pay particular attention to protecting those with protected characteristics. E.g. by intervening in cases of anti-social behaviour or hate crime associated with sexual orientation.

<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><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>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> <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>In the 2017 Household Survey, 51% of respondents agreed that the Police and Caerphilly County Borough Council are dealing with anti-social behaviour and crime issues that matter in this area. This was significantly lower than the survey in 2015 where 63% agreed. Residents were also asked whether they felt that levels of crime and anti-social behaviour in their community had got better, stayed the same or got worse in the previous 2 years and 63% felt that levels of crime had got better or stayed the same in the previous two years; 54% felt that anti-social behaviour had got better or stayed the same in the previous two years.</p> <p>For the 2018-2019 Financial Year the Community Safety Warden Service carried out 3924 patrols. Words of advice to persons acting contrary to acceptable standards of behaviour were given on 587 occasions. There were 548 interactions with Council Members via meetings, phone calls etc. Formal verbal warnings were given on 35 occasions. 78 items of alcohol were confiscated and 27 referrals for Anti-social behaviour Injunction consideration were made. 332 referrals were made to other departments/agencies to resolve problems in communities.</p> <p>The service was reduced from 9.5 fte to 6 fte to achieve financial savings in the 2019/20 budget setting process. As a result of the staffing reduction the service was reconfigured from April 2019 with a change in shift pattern, coverage, and a prioritisation of reactive work over routine patrols and community engagement.</p> <p>Any feedback from the budget engagement process will be used to improve our understanding.</p>
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## CONSULTATION

<b>7</b>	<p><b>Please outline the consultation / engagement process and outline any key findings.</b> <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 proposal is contained in the MTFP and as such will be subject to the Budget engagement process.</p>
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## MONITORING AND REVIEW

<p><b>8</b></p>	<p><b>How will the proposal be monitored?</b>  <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>The most readily recognisable monitoring of these proposals post-implementation will be in any increase in complaints about anti-social behaviour, absence of a patrolling presence, potentially increased response times by the police.</p> <p>Complaints which contain elements of discrimination will be recorded by the Equalities, Welsh language and Consultation Team for reporting purposes. The team will assist the relevant service area in responding to any such complaints</p>
<p><b>9</b></p>	<p><b>How will the monitoring be evaluated?</b>  <i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>Services in receipt of complaints will evaluate any elements of discrimination.</p>
<p><b>10</b></p>	<p><b>Have any support / guidance / training requirements been identified?</b>  <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>None identified.</p>
<p><b>11</b></p>	<p><b>If any adverse impact has been identified, please outline any mitigation action.</b></p> <p>Although 2 Community Safety Wardens will be retained within the General Enforcement Team clearly the service will be very much reduced and their role will need to be considered with a view to mitigating the impacts identified in section 4.</p> <p>The public will be advised to contact Gwent Police regarding issues of anti-social behaviour and hate crime etc.</p>
<p><b>12</b></p>	<p><b>What wider use will you make of this Equality Impact Assessment?</b>  <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 used as supporting evidence in the decisions being made around this savings proposal.</p>



<b>13</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 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 checked="" 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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Form completed by:	
<b>Name:</b>	Ceri Edwards
<b>Job Title:</b>	Environmental Health Manager
<b>Date:</b>	30 <sup>th</sup> October 2019

Head of Service Approval	
<b>Name:</b>	Rob Hartshorn
<b>Job Title:</b>	Head of Public Protection, Community & Leisure Services
<b>Signature:</b>	
<b>Date:</b>	7 <sup>th</sup> November 2019