

EQUALITY IMPACT ASSESSMENTS

CABINET

10 October 2011

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Equality Impact Analysis Full Tool with Guidance

Overview

This Tool has been produced to help you analyse the likelihood of impacts on the protected characteristics – including where people are represented in more than one – with regard to your new or proposed policy, strategy, function, project or activity. It has been updated to reflect the new public sector equality duty and should be used for decisions from 5th April 2011 onwards. It is designed to help you analyse decisions of high relevance to equality, and/or of high public interest.

General points

1. 'Due regard' means the regard that is appropriate in all the circumstances. In the case of controversial matters such as service closures or reductions, considerable thought will need to be given the equalities aspects.
2. Wherever appropriate, and in all cases likely to be controversial, the outcome of the EIA needs to be summarised in the Cabinet/Cabinet Member report (section 08 of this tool) and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.

Timing, and sources of help

Case law has established that having due regard means analysing the impact, and using this to inform decisions, thus demonstrating a conscious approach and state of mind ([2008] EWHC 3158 (Admin), [here](#)). It has also established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, through to the recommendation for decision. It should demonstrably inform, and be made available when the decision that is recommended. This tool contains guidance, and you can also access guidance from the EHRC [here](#). If you are analysing the impact of a budgetary decision, you can find EHRC guidance [here](#). Advice and guidance can be accessed from the Opportunities Manager: PEIA@lbhf.gov.uk or ext 3430.

Full Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	11/12 Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>Changes to the Taxicard scheme</p> <p>The Taxicard scheme is a discretionary pan-London transport scheme that provides subsidised door-to-door transport for people who have serious and long term mobility impairment and difficulty in using public transport. The scheme is jointly funded by London boroughs and Transport for London (TfL), co-ordinated and administered by London Councils. A number of changes to the scheme, following a reduction in the top up funding provided to the Council from Transport for London (TfL) to run the scheme and in consideration of current pressures on council budgets, are being presented to Cabinet for consideration.</p>
Lead Officer	<p>Name: Gill Sewell Position: Assistant Director, Children, Youth and Communities Email: gill.sewell@lbhf.gov.uk Telephone No: 0208 753 3608</p>
Date of completion of final EIA	21/09 /11

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Section 02	Scoping of Full EIA
Plan for completion	<p>Timing – completion by 26 August 2011</p> <p>Resources – Feedback from consultation with Taxicard users, database of Taxicard users</p> <p>Lead Officer – Gill Sewell</p> <p>Other Officers –Radhika Mehra (Project Officer), Natasha Price (Project Officer)</p>

What is the policy, strategy, function, project, activity, or programme looking to achieve?

Proposed changes to the Taxicard scheme

Background to the scheme

The Council currently contributes towards a pan-London Taxicard scheme for disabled residents in partnership with Transport for London (TfL). The Taxicard scheme provides subsidised taxis and private hire vehicles to residents with serious mobility impairments at similar costs to public transport. Each service user receives a total of 104 trips per annum, each with a minimum user charge of £1.50. Existing users, on average, use 29 journeys per year or 59 per active user (defined as using over 12 trips per year), which includes the use of double swiping. The scheme is intended to facilitate a degree of local travel and is not intended to meet all of the transport needs of residents with serious and long-term mobility impairments.

The financial context and consultation

As detailed in the Cabinet Report at 2.3, from 2011/12 TfL have made changes to the way it distributes funding to participating boroughs, which will see the allocation of TfL top-up funding for H&F's Taxicard scheme reduce from £463,696 in 2010/11 to £296,512 by 2014/15. In addition, 2.3.2 of the Cabinet Report notes that any budget overspends will have to be met by individual boroughs rather than London Councils, as had previously been the case. The demand for Taxicards has increased and despite this, there have been no material changes to the scheme for 15 years. It should be noted, however, that taxi fares in general have increased during this period which may have had a negative impact on users. In order to address the predicted overspend within the current budget level, as a result of the changes to TfL funding allocation, the Council consulted with service users on potential changes to the Taxicard scheme (see section 5 of the Cabinet Report) and in response to the consultation and the decreasing funding from TfL, is proposing a number of changes to the operation and eligibility criteria for Taxicard scheme. These recommendations will enable H&F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme and mitigate the impact of reduced funding from TfL. The recommendations are detailed in section 7 of the Cabinet report.

H&F currently has 2,345 Taxicard users (according to London Councils' database at the end of 2010/11). 1,113 (47%) of these are 'active users' of the scheme, defined as using greater than 12 trips in a year. This is detailed in section 2.1.1 of the report. Every registered service user (2,336 users were registered at the start of the consultation) was sent a paper consultation document to complete and return. There were 909 responses and additional information of 20 users who had passed away and have subsequently been removed from our register. Removing these 20 from the total number of users at the time of consultation means that the overall response rate is 39%. If the number of active users were taken into account it is likely that the response rate would be much higher.

Changes proposed

The key changes to the Taxicard scheme being proposed for implementation from January 2012 are as follows:

1. To increase the minimum user charge by £1 per trip from £1.50 to £2.50 from January 2012
2. To reduce the Council's subsidy contribution by £2 per trip from January 2012
3. To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1
4. In response to the public consultation, to maintain double swiping until April 2014.
5. In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.
6. To review the eligibility of Taxicard users and send the Taxicard database to the national fraud initiative every two years.
7. To carry over any unused contingency in the Taxicard scheme budget until 2014/15.
8. That the Leader transfers Cabinet responsibility for the Taxicard scheme from the portfolio of the Cabinet Member for Children's Services to the portfolio of the Cabinet Member for Residents Services under the Council's Scheme of Delegation.
9. That the Leader transfers responsibility for the Taxicard scheme from the Director of Children's Services to the Director of Finance and Corporate Services under the Council's Scheme of Delegation.

Recommendations 8 and 9 refer to the internal management of the scheme and have therefore not been considered as part of this assessment. However, it should be noted that it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for the Taxicard scheme or need a greater level of service.

The potential changes to the Taxicard scheme that we asked service users about are broken down into two areas: (1) changes recommended by London Councils at section 3 in the Cabinet Report and (2) additional recommendations from H&F at section 4 in the Cabinet Report. These proposed changes, the response on each from the public, and officers' recommendations are detailed below:

Changes recommended by London Councils :

Increase Minimum User Charge

The current minimum user charge for a Taxicard user is £1.50 per trip. The Council is proposing to increase the minimum user charge to £2.50 (a £1 increase). This change was recommended by the Transport and Environment Executive Sub Committee in order to address the projected budget overspend for the pan-London Taxicard scheme and has been implemented in 28 of the 32 London Boroughs on the scheme. This option was supported by respondents to the Taxicard consultation as the most preferred change.

- **Officers recommend that this change is proposed for implementation from January 2012**

Reduce the Maximum Subsidy Tariff

The trip subsidy is the maximum amount that funders (LBHF and TfL) pay towards a single trip. Once this maximum has been reached the user is responsible for the remaining fare. This option was not preferred by respondents to the consultation or in the focus groups, although it was also not the least preferred option. It was clear that users who prefer to use their Taxicard for longer journeys were more concerned by this change. By reducing the subsidy, shorter journeys will not be affected.

- **Officers recommend reducing this maximum subsidy by £2 from January 2012.**

End Double Swiping

Currently, if a trip goes above the maximum subsidy users are permitted to “double swipe,” using two of their annual trip allowances for one journey in order to travel further distances. London Councils recognised that ending double swiping is likely to have the biggest impact on service users. Ending double swiping was the least preferred option identified in the consultation process and therefore officers have recommended maintaining double swiping for the benefit of users for as long as possible within the approved budget. It is therefore recommended that ending double swiping is implemented from April 2014 when the reduction in funding from TfL and level of predicted overspend is most severe.

- **Officers recommend that double swiping is maintained until April 2014, in response to the public consultation.**

To reduce the annual limit to 8 trips per month

Currently, users are provided with an annual trip limit of 104 trips per year. The consultation proposed that this is reduced to 8 trips per month (96 per year), with no roll over. Recognising the impact on user flexibility officers have recommended that an annual trip limit is maintained for the benefit of users for as long as possible within the approved budget. It is therefore recommended that monthly trip limits are applied in 2014/15 when the reduction in funding from TfL and level of predicted overspend is most severe.

- **Officers recommend that an annual trip limit of 104 trips per year is maintained until April 2014, in response to the public consultation.**

Other changes proposed by H&F:

Changes to eligibility criteria

Under the existing Taxicard scheme residents are automatically eligible for a Taxicard if they meet one of the following eligibility criteria:

- a) Higher rate mobility component of disability living allowance
- b) War pension mobility supplement

c) Registered severely visually impaired or blind

There is a fourth, non-automatic, category for applicants where none of these three conditions apply which requires a doctor's medical assessment form to be completed.

Under the proposed changes the Council will expand the automatic eligibility criteria to also include Blue Badge holders (which requires a mobility assessment) and those residents with a higher rate attendance allowance. Officers believe that these changes to the eligibility criteria will ensure that the scheme targets those residents for whom the scheme is intended. These additional criteria should provide a consistent mechanism of assessment as recommended in response to the consultation. Officers have considered the response to the consultation from the Hammersmith and Fulham Disability and Consultative Forum that recognises that "people on Taxicard in practice would not be able to walk the minimum of 400 metres needed to get to the average bus stop." An appeals process will be available for those users who do not meet the automatic eligibility, and are able to walk over 70 metres, but have mobility issues and live much further from public transport and therefore may consider themselves eligible for support.

Under the proposed changes, the Council would not continue with the current non-automatic criteria, which is currently a doctor's medical form. Officers have acknowledged that this was not recommended by the consultation results but have outlined the reasons at 4.1.6 of the Cabinet Report for this recommendation.

- **Officers recommend expanding the automatic eligibility criteria to also include Blue Badge holders (requires a mobility assessment) and those residents with a higher rate attendance allowance.**
- **Officers recommend that the non-automatic criteria, currently a doctor's medical form, is disbanded although a robust appeals process will still apply.**

Profile of respondents to consultation:

As is given here, the common profile of respondents emerged as:

Older (over 65) (Age): **572 (63%)**

Disabled "Has a long term illness, health problem or disability which limits daily activities or work done (self-declared)" (Disability): **810 (89%)**

Female (Sex): **565 (62%)**

Profile of current Taxicard users, based on the London Council's database at the end of 2010/11:

Older (over 65) (Age): **1,427 (64.2%)**

Disabled (based on the 3 automatic eligibility criteria for the Taxicard scheme) (Disability): **827 (35%)** (** as noted in the Cabinet Report at 2.2.1 the remaining 65% of users would require a doctors medical assessment form to detail the nature of their mobility requirements).

Female (Sex): **1,509 (64%)**

The Race profile of service users is given in the analysis on Race below, and the proportions of disabled people represented within race groups have been given in different race groups to in order to highlight where some race groups are under, and some are over represented. Only one race group is broadly in line with the borough profile.

Further information is given below, where we have analysed the proposals against each protected characteristic, and used this to determine the relevance to (low, medium, high or unknown) and impact on each (positive, negative, neutral or unknown).

Age	<p>The scheme is open to all residents from the age of 2 (age at which you become mobile). Those under 18 are not currently covered by the protected characteristic of Age under the Equality Act 2010. Other protected characteristics do cover those under 18</p> <p>64.2% of Taxicard users are over the age of 65 (compared to the mid-year population estimates for 2009 of 10.3%). The high take up of residents over the age of 65 demonstrates the high relevance of all proposals to the age group of 65-plus.</p> <p>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</p> <p>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</p> <p>Given that a majority of Taxicard users are over 65 years old and therefore eligible for state pension it may be the case that users could be on a fixed income. Given this, recommendations 1 and 2 are likely to be of high relevance to the Council's Public Sector Equalities Duties (PSED) in terms of the protected characteristic of Age, and to individuals in the age group over</p>	High	Negative
		High	Negative

65 in particular.

The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on users' ability to maximise use of the service. In particular each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on all age groups and older people in particular, as the majority of service users. This negative impact will be reduced or even mitigated by maintaining double swiping for the benefit of users until April 2014. The impact of ending double swiping at this time is discussed below. This also supports responses to the consultation that recommended a gradual implementation of changes.

It should be highlighted that the proposed changes to the scheme, which will increase the cost to the user will have a greater affect on older residents whose mobility issues may compound with age and therefore there may have a greater reliance on the Taxicard service. This is recognised as being particularly disadvantageous to women who generally out live men and

therefore may be using the service for a longer period of time. As highlighted below 64% of Taxicard users are women.

Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1

The council is proposing to develop the automatic eligibility criteria to include:

- (a) Blue Badge eligibility
- (b) Higher rate attendance allowance.

This will replace the non-automatic doctor medical assessment form for reasons outlined in 4.1.6 of the Cabinet Report, where it is noted that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, as stated above and below, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.

The proposed introduction of the higher rate attendance allowance, which is a benefit provided to people aged 65 or over who need someone to help look after them because they have a mental or physical disability, as an automatic eligibility criteria is likely to be of high relevance to the Council's PSED duties in terms of the protected characteristic of Age, and to individuals in the age group over 65 in particular. This proposal would also be positive for them.

Removing the non-automatic criteria will impact on those users that are currently accessing the scheme in this way. Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Therefore, it is not possible to determine the relevance of the proposal or an

High

Positive

Unknown

Unknown

impact as the protected characteristics of the 211 is unknown. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people.

Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.

Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on elderly residents who may be on a fixed income.

Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and supporting a gradual implementation process.

High

Positive up to 2014/15
Negative thereafter

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officer have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.

The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently make more that 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year.

Officers have noted that applying monthly trip limits does affect the flexibility of the scheme. From 2014, this may have a particular impact on older residents who may find that they need their Taxicard more in a given month. In the consultation this particularly referred to frequent hospital appointments. Although H&F do not intend to monitor what the Taxicard is used for, the Taxicard is not intended for hospital transport as NHS provision is available, as noted in 4.3. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.

By deferring the decision to apply a monthly trip limit officers have attempted

High

Positive up to 2014/15
Negative thereafter

to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.

Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.

The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and Freedom Pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.

Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15

Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.

Other Options not recommended

Means testing was considered by officers to address the funding challenges but was not recommended.

Low

Positive

High

Positive

High

Positive

Various

Various

	Disability	<p>The current Taxicard scheme is designed to improve social mobility and independence for those users, who because of their physical disability, are less able to use public transport.</p> <p>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</p> <p>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</p> <p>A number of Taxicard users are likely to be on a fixed income as they are in receipt of the Disability Living Allowance. Given this, recommendations 1 and 2 are likely to be of high relevance to the Council's PSED duties in terms of the protected characteristic of Disability. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on disabled people's ability to maximise use of the service. In particular each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of</p>	High High	Negative Negative

implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on disabled users' ability to pay the increased amounts.

Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1

The council is proposing to develop the automatic eligibility criteria to include:

- (c) Blue Badge eligibility
- (d) Higher rate attendance allowance.

This will replace the non-automatic doctor medical assessment form for reasons outlined in 4.1.4 of the Cabinet Report, where it is noted that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, as stated above and below, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.

The higher rate attendance allowance is provided to all residents over the age of 65 who need someone to help them look after them because they have a physical or mental disability. Given the profile of current users, making this group automatically eligible will ensure the service is targeted at those users most in need of additional transport support and this will be both positive for those service users and of high relevance to the protected characteristic of Disability.

The eligibility for Blue Badge includes a mobility assessment which includes a physical assessment of their ability to walk 70 metres, measuring gait, speed, pain and breathlessness. The assessment also includes a number of

High

Positive

High

Positive

questions about the applicant's medical condition and history, their transport usage and needs, and their mobility. Respondents to the consultation as well as the response from the Hammersmith and Fulham Disability and Consultative Forum identified a need for a robust and fair assessment to determine eligibility. It is therefore recommended that the Blue Badge criteria, including the mobility component is applied to Taxicard users as part of the automatic eligibility. It is considered that this would have a positive effect on disabled service users and of high relevance to the protected characteristic of Disability.

High

Positive

For those that are not automatically eligible under the above criteria an appeals process, similar to that currently applied to the Blue Badge mobility assessment will also be applicable for this scheme. Whether an individual is given a Taxicard at the appeals process will depend on whether sufficient evidence has been provided that the individual has a chronic, or severe long term mental/physical health problem which results in them finding it difficult to use public transport. The relevance to protected characteristics and impact on a service user will depend on the outcome of an individual case. However, officers note that this has been designed in order to ensure that the scheme as a whole reaches disabled people. As such, a robust appeals process is of high relevance to the protected characteristic of Disability and is positive.

High

Positive

Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled

Unknown

Unknown

people and so directly help those people to access the scheme.

Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.

Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on disabled residents who may be on a fixed income.

Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change as well as supporting a gradual implementation process.

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double

High

Positive up to 2014/15
Negative thereafter

swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for the Taxicard scheme or need a greater level of service.

High

Positive

Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.

High

Positive up to 2014/15
Negative thereafter

The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently make more than 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users.

Officers have noted that applying a monthly trip limit does affect the flexibility of the scheme. This may have a particular impact on disabled residents who may find that they need their Taxicard more in a given month. In the consultation this particularly referred to frequent hospital appointments. Although H&F do not intend to monitor what the Taxicard is used for the Taxicard is not intended for hospital transport as NHS provision is available, as noted in 4.3. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.

By deferring the decision to apply a monthly trip limit until April 2014 officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on

users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.

Low

Positive

Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.

High

Positive

The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.

By applying a robust assessment officers believe we will ensure that resources continued to be targeted at disabled persons who have the protected characteristic of Disability. This will enable us to promote the service to those not currently making use of the scheme, therefore attempting to increase social mobility for disabled residents. As such, this proposal is of high relevance to, and will have a positive impact on, Disability.

Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15

High

Positive

Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may

		mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.		
	Gender reassignment	<p>Data is not available regarding gender reassignment amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is, in general, of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of gender reassignment.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	Various	Various
	Marriage and Civil Partnership	The law does not require service providers to take into account the impact of what they do on married people and civil partners. The law does require public authorities to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.	Unknown	Unknown

However, if a service is provided to married people, protection from sexual orientation discrimination requires that the same service and standards must also be provided to people who are civil partners.

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Data is not available regarding marital or civil partnership status amongst users and the service is not provided on different grounds to married people or to civil partners. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is, in general, of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.

Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of marriage and civil partnership.

Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled

Various

Various

Unknown

Unknown

		people and so directly help those people to access the scheme.					
	Pregnancy and maternity	<p>For clarification, pregnancy is not a disability under the Equality Act 2010. Data is not available regarding pregnancy and maternity amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of pregnancy and maternity.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	Various	Various			
	Race	<p>The ethnic groups of Taxicard users compared to the mid year population estimates for 2009 is illustrated below:</p> <table border="1"> <thead> <tr> <th>Ethnic group</th> <th>Taxicard Users</th> <th>Borough Profile</th> <th>Officer comments</th> </tr> </thead> </table>	Ethnic group	Taxicard Users	Borough Profile	Officer comments	Unknown
Ethnic group	Taxicard Users	Borough Profile	Officer comments				

White	877 (39.5%)	129,000 (76%)	Compared to the borough profile, active Taxicard users who identify as White are under-represented by half.
White British	575 (25.9%)	106,700 (62.9%)	Compared to the borough profile, active Taxicard users who identify as White British are under-represented by more than half
White Irish	99 (4.5%)	5,300 (3.1%)	Compared to the borough profile, active Taxicard users who identify as White Irish are over-represented by over a third
White Other	74 (3.3%)	16,900 (10%)	Compared to the borough profile, active Taxicard users who identify as White Other are under-represented by around two thirds
Black Caribbean	133 (6.0%)	6,300 (3.7%)	Compared to the borough profile, active Taxicard users who identify as Black Caribbean are over-represented by almost half
Black African	86 (3.9%)	7,600 (4.5%)	Compared to the borough profile, active Taxicard users who identify as Black African are slightly

				under-represented: by just over half a percentage point		
		Black Other	15 (0.7%)	1,400 (0.8%)	Active Taxicard users who identify as Black Other are broadly the same as the borough profile, with just 0.01% less of this group represented in the service user group	
		White and black Caribbean	39 (1.8%)	1,800 (1.1%)	Compared to the borough profile, active Taxicard users who identify as White and Black Caribbean are slightly over- represented, with 0.07% more of this group represented in the service user group	
		White and black African	24 (1.1%)	1,000 (0.6%)	Compared to the borough profile, active Taxicard users who identify as White and Black African are over-represented by almost half	
		Indian	48 (2.2%)	6,900 (4.1%)	Compared to the borough profile, active Taxicard users who identify as Indian are under- represented by almost half	
		Pakistani	58 (2.6%)	2,900 (1.7%)	Compared to the borough profile,	

				active Taxicard users who identify as Pakistani are over-represented by almost half		
				Compared to the borough profile, active Taxicard users who identify as Bangladeshi are largely under-represented, by over a percentage point		
	Bangladeshi	4 (0.1%)	1,800 (1.1%)			
				Compared to the borough profile, active Taxicard users who identify as Chinese are largely under-represented, by over a percentage point		
	Chinese	3 (0.1%)	2,500 (1.5%)			
				Compared to the borough profile, active Taxicard users who identify as White and Asian are under-represented by almost half a percentage point		
				Compared to the borough profile, active Taxicard users who identify as Asian Other are slightly over-represented		
				Compared to the borough profile, active Taxicard users who identify as Other		
	White and Asian	8 (0.4%)	1,800 (1%)			
	Asian Other	42 (1.9%)	2,200 (1.3%)			
	Other ethnic group	137 (6.2%)	2,900 (1.7%)			

				Ethnic Group are over-represented by over two-thirds		
	<p>In summary, the race groups that are under-represented in Taxicard service users are:</p> <p>White White British White Other Indian Bangladeshi Chinese White and Asian</p> <p>In summary, the race groups that are over-represented in Taxicard service users are:</p> <p>White Irish Black Caribbean Black African White and Black Caribbean White and Black African Pakistani Asian Other Other Ethnic Group</p> <p>The one race group that is broadly the same as the Taxicard service user group is Black Other.</p> <p>Further analysis is given below, and officers note that overall, increases in fares will impact more on those service users in the race groups identified above as being over-represented in the Taxicard service user group as compared to the borough profile. The changes proposed will be proportionately of more relevance to those disabled people in the race groups</p>					

that are over-represented. Because of this, officers consider the first two proposals to be of high relevance to Race, as some race groups could be differently affected by the proposals. Similarly proposal four and five from April 2014 will have a high relevance to race. Officers consider the third proposal to be of low relevance to race, as the automatic criteria are based on disability only (see below).

Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and

Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012

Officers note that residents from some ethnic minority communities may earn less than others, and this could account for the numbers of disabled people in the race groups listed above that are over-represented in Taxicard users. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on their ability to maximise use of the service. In particular, each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.

High

Negative

High

Negative

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change.

Officers consider that increasing charges could have a negative effect on disabled people from some ethnic groups' ability to pay. A review to measure the impact of the changes after year one and reflect on these for further recommendations will help to assess impact after initial changes are made.

Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1

Expanding the automatic eligibility criteria for the scheme is based on disability, in line with the purpose of the scheme. It is unlikely that a set of criteria that takes race into account could be devised, as the scheme needs to meet the needs of disabled people. As such, this is of low relevance to Race and any impact on race groups is expected to reflect the needs of disabled people within all race groups. This would have a small positive effect on Race.

Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people.

Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.

Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances.

Low

Positive

Unknown

Unknown

High

Positive up to 2014/15
Negative thereafter

Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above, this is likely to have a negative impact on disabled or elderly people from some ethnic groups' ability to pay.

Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and also supported a gradual implementation process.

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to

signpost residents to other providers if they are no longer eligible or need a greater level of service.

Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.

The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently take more than 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.

By deferring the decision apply a monthly trip limit officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.

Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.

The above recommendation was considered following the consultation in

High

Positive up to 2014/15
Negative thereafter

Low

Positive

Low

Positive

		<p>which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p>		
	<p>Religion/belief (including non-belief)</p>	<p>Data is not available regarding religion or belief and non-belief amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of religion or belief, or who have different religious or philosophical beliefs.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but</p>	<p>Various</p> <p>Unknown</p> <p>Various</p>	<p>Various</p> <p>Unknown</p> <p>Various</p>

		also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.		
	Sex	<p>There is a disproportionate number of females currently accessing the Taxicard scheme. This is likely to be a result of the greater proportion of users being in the 65+ age group and the longer life expectancy of women. The changes proposed will therefore be proportionately of more relevance to disabled women. Because of this, officers consider the first two proposals to be of high relevance to Sex, as women will be affected more by the proposals. Officers consider the third proposal to be of low relevance to Sex, as the automatic criteria are based on disability only (see below).</p> <p>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</p> <p>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</p> <p>Recommendations 1 and 2 may have a greater impact on female users considering the fact that women are likely to earn less over their lifetimes, live longer, and be on lower incomes. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on their ability to maximise use of the service. In particular, each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously, users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip</p>	<p>High</p> <p>High</p>	<p>Negative</p> <p>Negative</p>

user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on female users' ability to pay. However, the majority of the users are in receipt of benefit and the programme is not means tested.

Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1

Expanding the automatic eligibility criteria for the scheme is based on disability, in line with the purpose of the scheme. As such, this is of low relevance to Sex and any impact on Sex is expected to reflect the needs of men and women disabled people. This would have a small positive effect on the protected characteristic of Sex.

Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any more men than women, or more women than men. In other words, if this number could consist of individuals with the protected characteristic of Sex.

Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected

Low

Positive

Unknown

Unknown

characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.

Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.

Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on female elderly or disabled residents who may be on a fixed income.

Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and supporting a gradual implementation process.

High

Positive up to 2014/15
Negative thereafter

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.

The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently take more than 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users. Officers have noted that applying monthly trip limits does affect the flexibility of the scheme. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.

By deferring the decision to apply a monthly trip limit officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target

High

Positive (up to 2014/15, negative thereafter)

	<p>vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.</p> <p>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</p> <p>The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p> <p>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</p> <p>Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.</p>	low	Positive
	<p>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</p>	High	Positive
	<p>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</p>	Various	Various
Sexual Orientation	Data is not available regarding sexual orientation in relation to Taxicard. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various	Various	Various

relevance.

Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of religion or belief.

Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.

Unknown

Unknown

Human Rights and Children's Rights

Will it affect Human Rights, as defined by the Human Rights Act 1998?

Yes

Providing ways to access accessible transport for disabled people could increase access to education (article 14) and freedom to join and access associations/organisations (Article 11). Increasing independence of travel could also enhance the right to participate in free election (Article 3 of Protocol 1)

Will it affect Children's Rights, as defined by the UNCRC (1992)?

Yes

Providing ways to access accessible transport for disabled children could increase access to development opportunities, including education, leisure, culture and the arts. The service promotes the rights of disabled children by increasing social mobility and independence.

Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	<p><u>LBHF Consultation</u> In light of the proposed funding reductions from TfL, London Councils presented a list of recommended changes to local authorities' Taxicard schemes. Hammersmith and Fulham Council made the decision to consult with service users and therefore the proposed changes to the Taxicard scheme have been made in consideration of the consultation process which took place from 25th March 2011 to 6th May 2011. There were 909 responses to the consultation. A full list of responses is available in Appendix 7 to the Cabinet Report. During that time, focus groups with service users and others also took place. Particular organisations, offering services to disabled persons were targeted, including H&F day centres Hammersmith and Fulham Action on Disability (HAFAD), Better Government for Older People (consultative forum), Age UK, Citizens advice bureau, Hammersmith and Fulham Disability and Consultative Forum.</p> <p><u>Complaints and Comments</u> Through the consultation process a number of complaints and comments were noted by service users. These have influenced the proposed changes to the Taxicard policy. These recommendations have been considered alongside additional suggestions noted in section 4.2 and 4.3 of the cabinet report to improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab and ensure no unnecessary charges are passed onto users. Further information is given at Appendix 5, which offers a list of complaints from the consultation.</p> <p><u>Mid Year Population Estimates</u> Data has been compared to that of the Mid Year Population Estimates for 2009, which can be accessed here: http://www.lbhf.gov.uk/Directory/Council_and_Democracy/Plans_performance_and_statistics/Statistics_and_census_information/Census_information/7057_Demographic_Data_for_Hammersmith_and_Fulham.aspx</p>
New research	New research was not considered necessary, as we conducted a public consultation, available in Appendix 6 to inform the proposals. We have, however, included information on what other London boroughs have done (see Appendix 4)

Section 04	Undertake and analyse consultation
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<p>Consultation</p>	<p>The consultation on the proposed changes to the Taxicard scheme took place between 25 March 2011 and 6 May 2011. The new, single public sector equality duty came into effect on 6 April 2011. The public consultation included a questionnaire sent by post to all users of the H&F Taxicard scheme as well as series of focus groups, listed in Appendix 9. A summary of the consultation results is at section 5 of the Cabinet Report.</p> <p>Respondents were asked to rate possible changes to the scheme. 62% of respondents voted not to make any changes to the scheme as their most preferred option.</p> <p>Changes to the eligibility criteria (see 4.1 of the Cabinet Report) was more preferred than the changes suggested by London Councils (see section 3 of the Cabinet Report).</p> <p>71% of respondents put their least preferred option as ‘to no longer run the scheme’.</p> <p>The most preferred change was to increase the minimum user charge by £1 with 52% of respondents rating this as their most preferred change. The least preferred change was to end double swiping, with 36% of respondents rating this as their least preferred change. Ending double swiping was further recognised as the least preferred option in the response to the consultation from the Hammersmith and Fulham Disability and Consultative Forum, a service user group. The Hammersmith and Fulham Disability and Consultative Forum further noted the need for flexibility, supporting annual rather than monthly trip limits.</p> <p>In the comments from respondents a repeated suggestion was to introduce the changes gradually.</p> <p>In addition, see “Consultation on H&F Taxicard” at Appendix 7, and the analysis of all nine protected characteristics in Section 02 of this EIA.</p>
<p>Analysis</p>	<p>Officers have used the evidence from the consultation to inform the recommendations. These are detailed in section 7 of the Cabinet Report.</p> <p>Officers believe the recommendations enable H&F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme whilst mitigating the reduction in funding from TfL.</p> <p>Officers have recommended that the minimum user charge is increased by £1 recognising that this was the most preferred solution identified in the consultation.</p> <p>Officers have recommended that the subsidy is reduced, recognising that this was not the least preferred</p>

solution by users and the additional contribution that this would make to reducing the potential overspend.

Officers have expanded the automatic eligibility as a result of a review of service users and the intended target group. Changes to the eligibility criteria was recognised in the consultation as a more preferred solution than the options suggested by London Councils. In addition, officers believe the changes to the eligibility reflect the need identified in the consultation for a robust assessment of eligibility to support the Taxicard scheme, whilst also offering significant savings to reduce the overspend. As noted in 4.1.4, the Blue Badge eligibility and criteria for assessment are long established and are based upon legislation with clear guidance from the DfT. There is also an appeals process. This should give the Taxicard scheme eligibility more substance based upon established principles.

Officers have recommended not ending double swiping immediately recognising that this was the least preferred option from the consultation. This also reflects the repeated suggestion to introduce changes gradually.

Officers have not recommended introducing monthly trip limits immediately in order to maintain the flexibility of the scheme for as long as possible.

Officers have considered the negative impact on users following the introduction of these additional changes from April 2014. This has been considered alongside other council priorities and the councils overall financial position. The council is committed to retaining its financial contribution to the Taxicard scheme for the next three years, despite a number of efficiencies being made elsewhere.

By deferring the decision to end double swiping and applying monthly trip limits officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping and introducing trip limits will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping or introducing trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. In addition, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

Officers have recognised the limitations of the data which uses 2010/11 user activity to make financial predications over a four year period. Officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15.

These recommendations have been considered alongside additional suggestions noted in section 4.2 and 4.3 to

improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab and ensuring no unnecessary charges are passed onto users.

Section 05

Analysis of impact and outcomes

Analysis

The recommendations would enable H&F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme and mitigating the reduction in funding from TfL

Section 02 gives the analysis for each protected characteristic. This section analyses the proposals considered above and their overall relevance to, and impact on, the protected characteristics as a whole.

Recommendation 1: To increase the minimum user charge by £1 per trip from £1.50 to £2.50 from January 2012

Recommendation 2: To reduce the Council's subsidy contribution by £2 per trip from January 2012

As given above, these two proposals will be of high relevance to:

- Age groups, and those aged over 65 in particular
- Disability: disabled people
- Race: different race groups
- Sex: this will have more relevance to women than to men

The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on users' ability to maximise use of the service. Each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on those groups. This negative impact will be reduced by not ending double swiping immediately.

Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility

from January 2012, as set out in paragraph 4.1

As given above, this proposal will, in the main, be of high relevance to:

- Age groups, and those aged over 65 in particular
- Disability: disabled people

This is due to the fact that the proposed, expanded eligibility criteria will include the following:

- Blue Badge eligibility
- Higher rate attendance allowance.

More detail is given above in section 02 under Age and Disability. These will replace the non-automatic criterion of the doctor medical assessment form. Officers note that removing the doctor medical assessment form was not popular during consultation, however, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme. As noted, a large number of these people will also be older (over 65)

This proposal will also have an effect on 211 users who will no longer be eligible. It is not known if this number will consist of any group in particular and so it may have a relevance to, and negative impact on some or all of the following protected characteristics:

- Gender reassignment
- Marriage and civil partnership
- Religion or belief (including non-belief)
- Pregnancy and maternity
- Race
- Sex
- Sexual orientation

However, service users must have a disability in order to be able to access the scheme, and the Equality Act permits the Council to treat disabled people more favourably than non-disabled people. The eligibility criteria applies lawful discrimination as the scheme is only open to those residents with a physical disability.

Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.

Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.

As given above, these two proposals will be of high relevance to:

- Age groups, and those aged over 65 in particular
- Disability: disabled people
- Race: different race groups
- Sex: this will have more relevance to women than to men

By deferring the decision to implement this recommendation until April 2014 will initially have a positive impact on the above groups. Following 2014/15 implementation will have a negative impact, as detailed above, particularly in terms of an increased financial burden and a negative impact on the flexibility of the scheme for users. It is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

Recommendation 6: To review the eligibility of Taxicard users and send the Taxicard database to the national fraud initiative every two years.

This recommendation has been assessed under Age, Disability, Race and Sex. A greater level of analysis is under Disability as it will only be the details of disabled people that are sent as part of this proposal. It is therefore considered that this will be of high relevance to disabled people, and that it will be positive since it helps to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.

This will also enable the Council to promote the service to those not currently making use of the scheme, therefore attempting to increase social mobility for disabled residents. As such, this proposal is of relevant to Age, Disability, Race and Sex, and will have a positive impact on those protected characteristics. Overall though, the proposal will have the most relevance to and impact on, Disability because the information sent will be that of disabled people.

Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15

Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have an additional negative

impact for the above groups detailed above.

Section 06

Reducing any adverse impacts

Outcome of Analysis

Given the overall summary detailed at section 05, it is considered that the proposals will be of most relevance to the following protected characteristics (in order of relevance):

1. Disability
2. Age
3. Sex
4. Race

The increased charges that are proposed at recommendations 1 and 2 could be negative for all of the above. However, alongside the following, officers consider that the impact may be mitigated or even removed until 2014/15 by:

- not removing double swiping immediately
- expanding the automatic eligibility criteria
- reviewing eligibility of users every two years and sending information to national fraud database

After 2014/15, ending double swiping and introducing monthly trip limits is predicted to have an additional negative impact for the aforementioned protected characteristics. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping or applying monthly trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for a Taxicard or need a greater level of service.

Criteria for accessing the Taxicard scheme will now also be assessed using the Blue Badge eligibility criteria, which includes a mobility assessment. The Blue Badge eligibility and criteria for assessment are long established, are based upon legislation with clear guidance from the DfT. This will give the Taxicard scheme eligibility more substance based upon established principles. If users do not pass the mobility assessment but

believe they are eligible for a Taxicard an appeals process will apply. Following the transition process, the framework for appeals for new applicants will be aligned with the councils Blue Badge appeal process managed by the Head of Service for Blue Badges & Freedom Passes (Finance and Corporate Services).

Additional suggestions have been made in the cabinet report at section 4.2 and 4.3 to improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab to ensure no unnecessary charges are passed onto users. In addition It is recommended that information should also be provided to users to inform them that the taxi will start charging from the moment it arrives at the pick up point and therefore users should ensure they are ready at the arrival time to avoid any unnecessary charges.

A number of Taxicard users commented that the reason they used their Taxicard for hospital visits was because the NHS provision available took too long to get to the required destination, was un-reliable and that one could not guarantee that they would make their appointment in time. It is suggested that these complaints are passed onto the NHS transport team and a discussion about possible improvements to the NHS service and/or the potential of aligning provision with the Taxicard scheme is considered.

Section 07		Action Plan					
Action Plan		Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
		Inform users of changes	Communicate changes to current users in conjunction with London Councils	Following Cabinet decision – 2 months notice to be provided to users.	Natalie Luck	Users informed of changes to the Taxicard scheme	25/8/11

Section 08		Agreement, publication and monitoring				
Chief Officer sign-off		Name: Gill Sewell				

	Position: Assistant Director, Children, Youth and Communities Email: gill.sewell@lbhf.gov.uk Telephone No: 0208 753 3608
Key Decision Report	Date of report to Cabinet: 10 / 10 / 11 Confirmation that key equalities issues found here have been included: Yes
Opportunities Manager for advice and guidance only	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 12 September 2011 Email: PEIA@lbhf.gov.uk Telephone No: 020 8753 3430

Prevent Strategy: Equality Impact Assessment

June 2011

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Aims, Objectives and Projected Outcomes

The Government recognised that the previous *Prevent* strategy was not as effective as it could be and a full review of the strategy was therefore commissioned. A review team was established and an independent reviewer was appointed.

The Home Secretary asked the review to:

- look at the purpose and scope of the *Prevent* strategy, its overlap and links with other areas of Government policy and its delivery at local level;
- examine the role of institutions – such as prisons, higher and further education institutions, schools and mosques – in the delivery of *Prevent*;
- consider the role of other *Prevent* delivery partners, including the police and other statutory bodies;
- consider how activity on *Prevent* in the UK can be more joined up with work overseas;
- examine monitoring and evaluation structures to ensure effectiveness and value-for-money; and,
- make recommendations for a revised *Prevent* strategy.

The Equality Impact Assessment (EIA) forms part of the review of *Prevent* as outlined above. The aim of the EIA was to take stock of the relevant effects of the previous strategy and to consider whether any aspect of the proposed strategy would have a disproportionate impact on any of

the following protected characteristics (as detailed in the Equality Act 2010):

- Race;
- Religion or belief
- Disability;
- Gender;
- Gender reassignment;
- Sexual orientation;
- Age;
- Pregnancy and maternity; and
- Marriage and civil partnership.

Where negative impact is identified, proposals are made to address that impact wherever possible.

The individuals and organisations likely to have an interest in or likely to be affected by the new strategy are listed below. This list is not exhaustive.

- Members of all communities;
- Police forces in the United Kingdom;
- Local Authorities in the United Kingdom;
- The Home Office;
- Security Services;
- Commission for Equality and Human Rights;
- Independent Advisory Groups;
- Community networks/groups;
- Voluntary and Public Sector working with young people;
- Serious and Organised Crime Agency (SOCA);
- United Kingdom Border Agency;

- The Foreign & Commonwealth Office;
- Department for Education;
- Department for Culture Media and Sport;
- Department for Communities and Local Government; and,
- Department for Business, Innovation, and Skills.

The EIA provided an opportunity for partners, stakeholders and members of the public to share their views on the previous strategy with the Home Office and contribute to the development of a revised strategy.

Collecting Data

A number of data collection methods were employed as part of the review, including an online questionnaire, consultation events and smaller focus groups. Respondents were asked for their views on both the previous *Prevent* strategy and the proposed new strategy.

Specific equality questions were included in the online questionnaire and focus groups. Respondents' opinions of the proposed strategy were often informed by their experience of the previous strategy; these are set out below in relation to the protected characteristics outlined above. The impact of the proposed strategy in terms of Human Rights more generally has also been considered.

Feedback was received for the category of race, religion and belief from the online questionnaire, *Prevent* review (electronic) mail box, consultation events and focus groups. For all other characteristics, feedback was only received from the specific online EIA questions.

Overall trends/patterns

Consultation has identified that the previous strategy was perceived to have had a disproportionate impact with regards to religion and belief and to some extent race, namely on Muslims of South Asian, Middle Eastern or African heritage. There is also some qualitative evidence to suggest that age and gender had also been

impacted to an extent by the strategy in terms of perceived impact on young males. In regards to the proposed strategy it is felt the negative impact on religion/race could be mitigated by expanding the scope of the new strategy to include a wider range of threats. Whilst no regional variations have been identified in this consultation process, given the above it would follow that areas with high proportions of Muslims, particularly young males of South Asian, Middle Eastern or African heritage, could be perceived to have been disproportionately affected by the previous strategy. In terms of disability, there was also some, albeit small, indication that individuals with mental health issues could have been impacted by the strategy.

No significant issues were identified during this process with regards to sexual orientation, pregnancy and maternity, gender identity or marriage and civil partnership.

Quantitative and qualitative data

Race / Religion and belief

Respondents often used the terms 'race' and 'religion/belief' interchangeably; as such the analysis of the comments received under these is included together.

For the purposes of this EIA, Race has been taken to include colour, nationality, ethnic and national origins, in line with the Race Relations Act 1976.

Online consultation – responses to specific EIA questions

The impact on race, religion and belief is the strongest theme emerging from the online EIA consultation in both negative and positive terms and also the area whereby respondents were most divided.

Race

When respondents were asked whether the proposed strategy would have a negative impact on race, the majority of respondents (55%) answered no - it would not have a negative impact on race.

When asked whether the strategy would have a positive impact on race, the majority (63%) again answered no – that the strategy would not have a positive impact either.

Religion and belief

When respondents were asked whether the proposed strategy would have a negative impact on religion/belief, the majority of respondents (59%) answered yes – the strategy would have a negative impact on religion/belief.

This category is the strongest area whereby online respondents envisaged a negative impact of the strategy.

When asked whether the proposed strategy would have a positive impact on religion/belief, the majority (57%) answered no – the strategy would not have a positive impact on religion/belief.

The main theme dominating the online comments in terms of perceived negative impact of the *Prevent* strategy on race/religion/belief, was that the previous *Prevent* strategy was too Islam focused and only aimed at Muslims. Respondents felt strongly that the focus on Al Qa'ida-influenced terrorism had led to the stigmatising and stereotyping of Muslims, especially those of South Asian (e.g Pakistani), Middle Eastern and African descent.

A small number of respondents also commented that the previous strategy had provided further fuel to extreme-right wing groups to marginalise Muslims in the UK. Some respondents felt that there should be a clearer methodology for assessing risk which should be known nationally. A small number of respondents also stated that lessons should be learned from the previous strategy in terms of language and terminology. Also that the new strategy should be mindful of stereotyping Muslims.

More positively, a number of online respondents felt that an effective strategy which encouraged dialogue and joint activity between all communities would have a beneficial impact on integration and race relations as it would aid understanding of not only the problem but also of different cultures.

Online consultation – responses to wider *Prevent* review questions

A number of responses from the wider online consultation process also referred to a disproportionate impact on religion in terms of a perceived stigmatisation of Muslims under the previous *Prevent* strategy. It was felt that expanding the strategy to address a wider range of threats (e.g. terrorism by the extreme right wing or other ethnic or religious organisations) would help to mitigate this issue. However, there was a minority who argued that, as a counter-terrorism strategy, *Prevent* should focus exclusively on the greatest threat and not divert scarce resources to tackle other threats.

Consultation events

A minority of participants from the consultation events also referenced an impact on religion/belief in relation to a perceived stigmatisation of Muslims. Expanding the strategy to address a wider range of threats and also a stronger communication strategy were cited as areas which could mitigate such negative impact.

Focus groups

The majority of Muslim respondents within the focus group sessions expressed concern that a strategy which focused solely on Al Qa'ida-inspired terrorism would have a negative impact on individuals of the Muslim faith. This was set out in terms of negative stereotyping of Muslims and Muslim communities and resentment from wider society regarding preferential treatment e.g. in relation to resources. These concerns were also noted by approximately one third of the non-Muslim sample.

	<p><u>Prevent review (electronic) mailbox</u></p> <p>Responses received via the <i>Prevent</i> review electronic mailbox further highlighted concerns regarding the stigmatisation of Muslim communities and a perceived lack of transparency in allocating public resources. It was felt that these factors had served to undermine community cohesion in some parts of the country and fuel anti-Muslim sentiments.</p> <p><u>House of Commons Communities and Local Government Select Committee report, Preventing Violent extremism (2010)</u></p> <p>The House of Commons CLG Select Committee on Preventing Violent Extremism (2010) reported similar findings, stating that the focus on the Muslim community had been unhelpful, stigmatising and alienating and could be perceived as legitimising the extreme right. The committee commented further that, ‘the previous system for allocating <i>Prevent</i> funds was not based on risk and work addressing this should be a priority.’</p>
<p>Disability</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The overwhelming majority of respondents did not perceive there to be a negative (96%) or a positive (85%) impact of the proposed strategy in terms of disability.</p> <p>This is supported in the comments whereby the majority of respondents could see no impact on disability or see any relevance between <i>Prevent</i> and disability. Those who did tended to refer to mental health or learning disabilities with opinion split on whether <i>Prevent</i>’s impact will be positive or negative. Those who think <i>Prevent</i> will have an adverse impact believe that those with mental health issues will become ‘victims of <i>Prevent</i>’ as they will be more likely to be arrested and imprisoned. Alternatively, some expressed concern that those with mental/learning disabilities were easy targets for radicalisers and that <i>Prevent</i> would provide support for such people, therefore having a positive impact.</p>
<p>Gender</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>When respondents were asked whether the strategy would have a negative impact on gender, the majority of respondents (78%) answered no - it would not have a negative impact on gender.</p> <p>When asked whether the proposed strategy would have a positive impact on gender, the majority (77%) again answered no – that the strategy would not have a positive impact either.</p>

	<p>However, where respondents explained their initial response, it was overwhelmingly felt that men would be most negatively impacted by the <i>Prevent</i> strategy on the basis that they are perceived to be at greatest risk of radicalisation. Arguably this had resulted in them feeling stereotyped and targeted (e.g. under “stop-and-search” counter-terrorism powers). A smaller group felt that women have been negatively impacted by virtue of perceptions (underlying in the strategy) of male dominance and more should be done to redress the balance. However, there was also the view that it is difficult to reach into some groups without encountering gender issues. For example, <i>Prevent</i> aimed at women could be seen as an attempt to undermine traditional relationships between genders within certain cultures.</p> <p>Conversely, some respondents felt that <i>Prevent</i> had had a positive impact on women. Some perceived that women are not treated equally within some groups and <i>Prevent</i> had the potential to remove the constraints that block their participation in the agenda, by empowering them to tackle intolerance and play a more active role in society.</p>
<p>Gender Reassignment</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The overwhelming majority of respondents participating in the online EIA consultation process did not perceive there to be a negative (95%) or a positive (86%) impact of the strategy in terms of gender reassignment.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact on individuals who have undergone gender reassignment. A small minority of respondents commented that such individuals may be more vulnerable due to cultural intolerance and experience of hate crime.</p>
<p>Sexual Orientation</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The majority of online respondents did not envisage any negative (91%) or positive (85%) impact of the proposed strategy in terms of sexual orientation.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact in terms of sexual orientation if the strategy were to be expanded to include a wider range of threats. A small number stated that a positive impact of the <i>Prevent</i> strategy would be in creating a climate in which it was more acceptable to challenge homophobia.</p>

<p>Age</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>When respondents were asked whether the strategy would have a negative impact on age, the majority of respondents (77%) answered no - it would not have a negative impact on age.</p> <p>When asked whether the proposed strategy would have a positive impact on age, the majority (77%) again answered no – that the strategy would not have a positive impact either.</p> <p>The prevailing sentiment amongst those who explained their initial response was that the young are most affected by <i>Prevent</i>. The effect is considered to be both negative and positive. Those who felt that the previous <i>Prevent</i> strategy had had a negative impact stated that the young had been stigmatised and presumptions had been made because of their age.</p> <p>More positively, others felt that the young are being targeted by radicalisers and will suffer most if <i>Prevent</i> does not focus on them. It was noted that the proposed strategy could promote active engagement and raise awareness of the risks. Indeed, several respondents felt it important to target the young to produce balanced and empowered individuals who could better challenge terrorist ideology in the future. Some went further to state that focusing on the young could help raise their aspirations and help them to make positive career choices.</p> <p>It is important to note that whilst many references are made to the ‘young’, very few respondents actually qualified it with a specific age group. Where respondents did offer a definition of ‘young’, the range tended to be from 11 to 35 years old. A number of respondents also expressed concern that <i>Prevent</i> should be age neutral; arguing that <i>Prevent</i> should apply to all age groups as there is no single profile.</p>
<p>Pregnancy and Maternity</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The vast majority of online respondents did not deem there to be either a negative (97%) or positive (91%) impact of the strategy in terms of pregnancy and maternity.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact in terms of pregnancy and maternity particularly if the new strategy was inclusive of all communities. A small minority stated the strategy could have a positive impact on integration in terms of promoting cultural awareness if it included all communities.</p>

<p>Marriage and Civil Partnership</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The majority of respondents did not envisage there to be either a negative (96%) or positive (87%) impact of the strategy in terms of marriage and civil partnership.</p> <p>A small number stated the strategy could have a positive impact on integration if it was inclusive of all communities and addressed a wider range of threats.</p>
<p>Human Rights</p>	<p>The proposed strategy is not intended to interfere with the Convention rights of any person or group, though it is accepted that certain communities may perceive an adverse impact.</p> <p>The rights that are being protected under the Home Office <i>Prevent Strategy</i> are:</p> <ul style="list-style-type: none"> • Article 2: Right to life; • Article 5: Right to liberty and security; • Article 6: Right to a fair trial; • Article 7: No punishment without law; • Article 8: Right to respect for private and family life; • Article 9: Freedom of thought, conscience and religion; • Article 10: Freedom of expression; • Article 11: Freedom of association and assembly; • Article 13: Right to effective remedy; and, • Article 14: Prohibition of discrimination. <p>The Protocols under the Human Rights Act that are being protected are:</p> <ul style="list-style-type: none"> • Article 1, the Protection of Property; and, • Article 2: Right to education. <p>To ‘test’ whether the proposed <i>Prevent Strategy</i> interferes with Human Rights, consideration has been given to the following three questions. Is the strategy:</p> <ul style="list-style-type: none"> • Legal; • Necessary; and, • Proportionate. <p>It is deemed that the strategy as proposed is legal, necessary and proportionate given the national threat to security posed by terrorism in the United Kingdom and does not therefore interfere with the human rights of any group or individual.</p>

Specific equality issues and data gaps that may need to be addressed through consultation and/or further research

A number of data collection and monitoring arrangements will be put in place in line with the revised strategy. This information will be reviewed regularly and used as a basis for further research and to evaluate delivery of the refreshed strategy.

Race, Religion and Belief

The impact of the new strategy in terms of race and religion will need to be monitored closely. ACPO (TAM) will put in place *Prevent* EIA monitoring arrangements with all Police Forces in England and Wales and ensure that data is shared with OSCT *Prevent* and reviewed on a regular basis.

OSCT *Prevent* will also put in place a Case Management Information System to monitor data including the race and religion/belief of all individuals subject to *Prevent* interventions.

Age

OSCT *Prevent* will include age within its case management monitoring arrangements as described above.

Gender

OSCT *Prevent* will include gender within its case management monitoring arrangements as described above.

Disability and Mental health

There was some qualitative data and anecdotal information which indicated that disability in terms of mental health may be impacted by the strategy. Further research would be required in order to determine this.

OSCT *Prevent* will include disability and mental health within its case management monitoring arrangements as described above.

Involving and Consulting Stakeholders

Internal consultation and Involvement

In addition to extensive consultation with a wide range of Government departments and agencies, a number of directorates within OSCT (Prevent, Pursue, Protect, RICU and the Strategy team) were consulted.

The following Home Office staff networks/ associations were alerted to the *Prevent* review and invited to contribute to the process either online, by email or by mail:

- Home Office Disability network;
- Spectrum;
- A:Gender;
- Home Office Women;
- Hindu Forum;
- Home Office Islamic Network;
- Home Office Christian Network;
- Home Office Sikh Association;
- Pagan Network;
- The Network.

The online consultation included a section to state the individual's profession or organisation, however this information was not mandatory. Where this information was supplied, the questionnaire showed that 4% of responses were received from those identifying themselves as from Government departments and 2% as from faith networks within Government departments.

External consultation and involvement

The review and consultation process were announced in a press notice on 9 November 2010. The online consultation ran between 10 November and 17 December 2010 and was made available through the Home Office public facing website and via a restricted *Prevent* stakeholder website.

Members of the public were able to provide their views on *Prevent* online, via email (to a dedicated address), or by post. In addition, 11 regional consultation events and 24 in depth focus groups were held across England, Scotland and Wales in December and January.

Prevent review online consultation

A questionnaire was produced which covered key aspects of the previous strategy and sought the views of respondents to proposals on where changes to the strategy could be made. In addition, the following specific EIA questions were included in relation to the protected characteristics as given under Aims, Objectives and Projected outcomes:

- In your view would the Government's revised *Prevent* strategy (as discussed in this document) **negatively** impact any of the above groups?
- In your view would the Government's proposed *Prevent* strategy (as discussed in this document) **positively** impact any of the above groups?

Respondents were asked to explain their responses in relation to each of the diversity strands. A total of 169 people responded to the EIA questions. This constituted approximately 52% of those completing the full online questionnaire.

Prevent review consultation events

586 delegates attended 11 events in Glasgow, Nottingham, Cambridge, Warrington, London, Taunton, Woking, Birmingham, Llandrindod Wells, Newcastle and Leeds. These includes representatives from:

- Local Authorities (38%)
- Police (22%)
- Community organisations and faith groups (11%)
- FE, HE and schools (including academics) (6%)
- NOMS and Probation (4%)
- NHS (3%)
- YJB and Youth Offending Services (2%)
- Regional Government Offices (2%)
- Fire and Rescue Services (2%)
- Other (including members of Fire and rescue services, charities, project representatives, consultants, officials from Government Departments) (10%).

Prevent review focus group events

As part of the consultation, 24 focus groups were conducted across England, Scotland and Wales in addition to the consultation events. Respondents were selected using a recruitment screener designed to capture a range of backgrounds (working status, socio-economic group, age, gender). A separate Muslim only sample was also selected, given the perceived negative impact of the previous strategy on this group, in order to ensure that their views were fully represented.

Experienced recruiters sourced respondents through a mix of on-street and snowballing techniques. The total number of individuals selected was approximately 124. This consisted of 37 in the Muslim sample and 87 in the non-Muslim sample. None of the individuals selected had been involved in any previous *Prevent*

consultations or were working in a *Prevent*/ stakeholder role or for community organisations with a political interest.

Given the findings of the online consultation in terms of the impact of the previous strategy on race/religion/belief, the following question was included in the focus groups for discussion:

‘Some people are concerned that if the strategy focuses on Al Qa’ida inspired terrorism then this creates problems for the Muslim population in the UK, for example:

- Inadvertently focus on Islam as a religion;
- Stigmatise or reinforce stereotypes of Muslims as terrorists;
- Provide far right groups with ‘fuel’ to marginalise Muslims in the UK.

How much do you think the *Prevent* strategy should take this into account? In what ways? What could it do to mitigate this problem?’

Prevent review (electronic) mail box and postal responses

78 responses to the wider *Prevent* review were also received via email and post, including from:

- The Equality and Human Rights Commission;
- The Civil Service Muslim Network;
- The North Wales Regional Equality Network.

ACPO (TAM)

In 2008 ACPO (TAM) commissioned all Police Forces in England and Wales to undertake an EIA on the delivery of the *Prevent* strategy within their force. 33 Police forces responded to this request.

Other parts of OSCT

An Equality Impact Assessment has also been conducted as part of the refresh of CONTEST and as part of the review of counter-terrorism and security powers, and protective security. The findings of these reports are available separately.

Assessing Impact

The EIA has highlighted concerns that the previous *Prevent* strategy has been perceived to have disproportionately impacted on religion/belief and to some extent on race, specifically Muslims of South Asian/Middle Eastern/African descent. The nature of this impact has been perceived to be largely negative, with members of the Muslim community reporting that they have felt targeted, 'spied upon' and unfairly labelled as potential terrorists. Responses have also indicated that support to Muslim groups under the *Prevent* banner has had a beneficial impact on integration and helped to raise the aspirations of young people and steer them towards positive career choices.

Consultation also suggested that including a wider range of threats in the new strategy would mitigate the negative impact on Muslim communities. The review looked carefully at the issue of stigmatisation and the strategy will be expanded to include all forms of terrorism. However, the most significant threat to the United Kingdom remains that from Al Qa'ida-influenced terrorism. The new strategy will therefore primarily work to tackle this threat, although activity will take place to address other threats. It is recognised that young people and young men in particular are more vulnerable to the risks associated with terrorism. Given this, there may continue to be a perception of disproportionate impact on young men under the new strategy.

In order to mitigate against negative impact of the new strategy upon any individual or group, more robust monitoring arrangements are being developed in relation to delivery of the strategy to ensure greater transparency and improved evaluation. A more sophisticated risk assessment process has also been developed to understand where *Prevent* work needs to be prioritised. The Department for Communities and Local Government will lead on developing an integration strategy.

Furthermore, the consultation process has also demonstrated a need for much stronger communications from the centre in terms of the aims and purpose of the strategy. The Research, Information and Communication Unit will work closely with *Prevent* in order to develop this further. In addition, training for frontline staff working on *Prevent* will also be enhanced and more focused in line with priority areas, sectors and institutions.

We judge that these measures will result in a more tightly focused *Prevent* strategy and help to mitigate further against disproportionate negative impact of the revised strategy.

Action Plan - PREVENT Equality Impact Assessment Report - June 2011

Action / activity	Owner and interested stakeholders	Dependencies / risks / constraints	Completion date	Progress update
ACPO (TAM) to put in place <i>Prevent</i> EIA monitoring arrangements with all Police Forces in England and Wales and ensure that data is shared with OSCT <i>Prevent</i> and reviewed on a regular basis.	ACPO (TAM)	Accurate and timely completion by Police Forces (ACPO will liaise with all forces to ensure consistency).	Ongoing	
OSCT <i>Prevent</i> to review all <i>Prevent</i> EIA data collected by ACPO (TAM).	OSCT PREVENT	Accurate and timely completion by Police Forces.	Ongoing	
OSCT <i>Prevent</i> to put in place a Case Management Information System to monitor data of individuals subject to <i>Prevent</i> interventions. This information will be reviewed regularly and used as a basis for further research and to evaluate delivery of the refreshed strategy.	OSCT PREVENT	Accurate and timely completion by practitioners.	Ongoing	

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This publication is available for download at www.official-documents.gov.uk.

Equality Impact Analysis Initial Screening Tool with Guidance

Overview

This Tool has been produced to help you analyse the likelihood of impacts on the protected characteristics – including where people are represented in more than one – with regard to your new or proposed policy, strategy, function, project or activity. It has been updated to reflect the new public sector equality duty and should be used for decisions from 5th April 2011 onwards. It is designed to help you determine whether you may need to do a Full EIA. If you already know that your decision is likely to be of high relevance to equality, and/or be of high public interest, you should contact the Opportunities Manager, as s/he may recommend moving directly to a Full EIA.

General points

1. 'Due regard' means the regard that is appropriate in all the circumstances. In the case of controversial matters such as service closures or reductions, considerable thought will need to be given the equalities aspects.
2. Wherever appropriate, and in all cases likely to be controversial, the outcome of the EIA needs to be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.

Timing, and sources of help

Case law has established that having due regard means analysing the impact, and using this to inform decisions, thus demonstrating a conscious approach and state of mind ([2008] EWHC 3158 (Admin), [here](#)). It has also established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, through to the recommendation for decision. It should demonstrably inform, and be made available when the decision that is recommended. This tool contains guidance, and you can also access guidance from the EHRC [here](#). If you are analysing the impact of a budgetary decision, you can find EHRC guidance [here](#). Advice and guidance can be accessed from the Opportunities Manager: PEIA@lbhf.gov.uk or ext 3430.

Initial Screening Equality Impact Analysis Tool

Section 01	Details of Initial Equality Impact Screening Analysis			
Financial Year and Quarter	2011 to 2015			
Name of policy, strategy, function, project, activity, or programme	Bishops Park Café Tender 2011			
Q1 What are you looking to achieve?	To award management contract for Bishops Park Cafe			
Q2 Who in the main will benefit?	Park users and the Council			
	Age	The refurbishment itself will be of medium relevance to Age, as the improvements to access will also help those with age-related mobility impairments, and parents with young children who need to access the premises more easily than other people. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	M	+
	Disability	The refurbishment itself will be of high relevance to Disability, as the improvements will provide access for disabled people. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	H	+ The refurbished Café complies with the DDA
	Gender reassignment	The refurbishment itself will not be of particular relevance to gender reassignment. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	L	+

Marriage and Civil Partnership	The refurbishment itself will not be of particular relevance to marriage and civil partnership. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	L	+
Pregnancy and maternity	The refurbishment itself will be of medium relevance to pregnancy and maternity, as the improvements to access will also help those with any pregnancy-related mobility impairments, and mothers with infants, who need to access the premises more easily than other people. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	M	+
Race	The refurbishment itself will not be of particular relevance to race. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	L	+
Religion/belief (including non-belief)	The refurbishment itself will not be of particular relevance to religion or belief (including non-belief). Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	L	+
Sex	The refurbishment itself will be of medium relevance to Sex, as the improvements to access will also help parents with young children who need to access the premises more easily than other people and it is likely that women will benefit in this regard more than men. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	M	+
Sexual Orientation	The refurbishment itself will not be of particular relevance to sexual orientation. Service in the café will comply with the requirements of the Equality Act 2010 in respect of this protected characteristic	L	+

Human Rights and Children's Rights

Will it affect Human Rights, as defined by the Human Rights Act 1998?

No

	<p>Will it affect Children's Rights, as defined by the UNCRC (1992)?</p> <p>No</p>
<p>Q3 Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes</p> <p>The refurbished Café complies with the DDA. Wheel chair access has been developed and a disabled loo has been installed in the Café. These facilities were not available pre-refurbishment.</p>
<p>Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?</p>	<p>No</p>

Initial Screening Equality Impact Analysis Tool

Section 01	Details of Initial Equality Impact Screening Analysis
Financial Year and Quarter	2011/12 - Qtr 4
Name of policy, strategy, function, project, activity, or programme	This is a capital projects scheme THE REMOVAL OF ASBESTOS: AT RIVERSIDE GARDENS BLOCKS A-Q (1-171) AND S-T (180-199)
Q1 What are you looking to achieve?	<p>In 2010 a scheme was proposed to overhaul and upgrade the cold water storage tanks in the loft spaces of Riverside Gardens. During the planning stage it became apparent that the water tank lids contained asbestos materials that were in varying stages of disrepair. A full investigation was undertaken in all of the loft spaces which identified a number of concerns.</p> <p>The water tank lids have an asbestos cement layer which has over time, significantly deteriorated in condition causing widespread contamination of the loft space areas. In addition, there is significant Asbestos Insulation Board (AIB) contamination which appears to have originated from the installation of the roof soffit boards. There is further asbestos cement contamination originating from damaged and broken redundant flues that are present in various areas in the loft spaces.</p> <p>The spread of asbestos contamination is extensive and includes the contamination of non-asbestos 'friable' insulation materials such as man-made-mineral fibre (glass fibre) and foam insulations.</p> <p>These works need to be undertaken for the removal of asbestos cement tank lids which will subsequently be sealed with 1000 gauge polythene and gaffer tape to prevent any dust and debris falling into the tank. And the effective decontamination of the loft spaces of asbestos fibres prior to the replacement of the communal cold water storage tanks.</p>
Q2 Who in the main will benefit?	These works will benefit the residents of Riverside Gardens both by allowing the installation of new cold water storage tanks and future maintenance of the roof spaces and any equipment within these areas.

Age	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	L	=
Disability	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	L	=
Gender reassignment	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	L	=
Marriage and Civil Partnership	These works will benefit all residents regardless of their marriage/civil partnership status.	L	=
Pregnancy and maternity	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	L	=
Race	These works will benefit all residents regardless of their race.	L	=
Religion/belief (including non-belief)	These works will benefit all residents regardless of their religion.	L	=
Sex	These works will benefit all residents regardless of their sex.	L	=
Sexual Orientation	These works will benefit all residents regardless of their sexual orientation.	L	=

Human Rights and Children's Rights

Will it affect Human Rights, as defined by the Human Rights Act 1998?

No

Will it affect Children's Rights, as defined by the UNCRC (1992)?

No

Q3 Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?	<p>Yes</p> <p>The works will benefit all residents equally.</p>
Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?	<p>No</p> <p>If the answer here is 'yes', then it is necessary to go ahead with a Full Equality Impact Analysis. You should also consider a Full Equality Impact Analysis if your decision is likely to be of high relevance to equality, and/or be of high public interest.</p>

Initial Screening Equality Impact Analysis Guidance

Section 01	Details of Initial Equalities Impact Screening Analysis
Name of policy, strategy, function, project, activity, or programme	<p>A Policy refers to an approved decision, principle plan or a set of procedures by Cabinet, or a Cabinet Member under delegated powers that affects the way that the Council conducts its business both internally and externally. A policy can include: strategies, guides, manuals and common practice.</p> <p>A Strategy refers to a systematic short term or a long term plan of action that is designed to achieve a specific business benefit or goal(s).</p> <p>A Function refers to any actions and/or activities designed to achieve a specific business benefit or goal.</p> <p>A Project defines how a temporary structure or scheme can achieve a specific business benefit or goal(s). A project can be implemented by setting up aims and objectives, resources, communication, budget needs and timelines.</p> <p>An Activity is a specific task (or a groups of tasks) which can also form as part of a 'function'.</p> <p>A Programme is a portfolio of activities and projects that are co-ordinated and managed as a unit such that they realise common outcomes and benefits.</p>

<p>Q1 What are you looking to achieve?</p>	<p>For example this might help to implement outcomes identified in policies such as the Single Equality Scheme, Disability Equality Scheme, other EIAs in your service department, or in another department that your service/service users also interact with and draw down services from, Corporate Plan, LAA Targets, CAA Aims, UDP, or JSNA.</p>
<p>Q2 Who in the main will benefit?</p>	<p>Hereafter, 'policy' means policy, strategy, function, project, activity, or programme</p> <p>Disability Service providers also have an anticipatory duty to make reasonable adjustments for disabled people. These two duties frequently overlap and it is sensible to consider them together. For example, can you:</p> <ul style="list-style-type: none"> ▪ Provide accessible communications? ▪ Change how you collate and use data? ▪ Revise how you involve service users? <p>Analyse the impact of the policy on the protected characteristics with due regard to the Public Sector Equality Duty.</p> <p>Use your reasoning in order to determine whether the policy will be of high, medium or low relevance to the protected characteristics. What do we mean by these terms?:</p> <p>High</p> <ul style="list-style-type: none"> ▪ The policy, strategy, function, project, activity, or programme is relevant to all or most parts of the general duty, and/or to human rights ▪ There is substantial or a fair amount of evidence that some groups are (or could be) differently affected by it ▪ There is substantial or a fair amount of public concern about it <p>Medium</p> <ul style="list-style-type: none"> ▪ The policy, strategy, function, project, activity, or programme is relevant to most parts of the general duty, and/or to human rights ▪ There is some evidence that some groups are (or could be) differently affected by it ▪ There is some public concern about it <p>Low</p> <ul style="list-style-type: none"> ▪ The policy, strategy, function, project, activity, or programme is not generally relevant to most parts of the

general duty, and/or to human rights

- There is little evidence that some groups are (or could be) differently affected by it
- There is little public concern about it

Use your reasoning to determine whether the impact will be positive, neutral, or negative. There are three possible outcomes:

- **Positive:** The EIA shows the policy is not likely to result in adverse impact for any protected characteristic and does advance equality of opportunity, and/or fulfils PSED in another way
- **Neutral:** The EIA shows the policy, strategy, function, project or activity is not likely to result in adverse impact for any protected characteristic and does not advance equality of opportunity, and/or fulfils PSED in another way
- **Negative:** The EIA shows the policy, strategy, function, project or activity is likely to have an adverse impact on a particular protected characteristic(s) and potentially does not fulfil PSED, or the negative impact will be mitigated through another means.

Should your policy not be applicable, you must note this and state why.

Human Rights, Children's Rights

Additionally, demonstrate here that the impact on **Human and/or Children's Rights** arising from the policy has been considered.

Human Rights

Public authorities have an obligation to act in accordance with the European Convention on Human Rights. These are:

- Article 2: [Right to life](#)
- Article 3: [Freedom from torture and inhuman or degrading treatment](#)
- Article 4: [Right to liberty and security](#)
- Article 5: [Freedom from slavery and forced labour](#)
- Article 6: [Right to a fair trial](#)
- Article 7: [No punishment without law](#)
- Article 8: [Respect for your private and family life, home and correspondence](#)
- Article 9: [Freedom of thought, belief and religion](#)
- Article 10: [Freedom of expression](#)
- Article 11: [Freedom of assembly and association](#)

- Article 12: [Right to marry and start a family](#)
- Article 14: [Protection from discrimination in respect of these these rights and freedoms](#)
- Article 1 of Protocol 1: [Right to peaceful enjoyment of your property](#)
- Article 2 of Protocol 1: [Right to education](#)
- Article 3 of Protocol 1: [Right to participate in free elections](#)

(Article 1 of Protocol 13 is: Abolition of the death penalty)

Each of the above links takes you to explanations and examples provided by the EHRC. Further, the [EHRC](#) and the [Ministry of Justice](#) both provide guides for public authorities.

Children's Rights (UNCRC)

All children and young people up to the age of 18 years have all the rights in the Convention. Some groups of children and young people - for example those living away from home, and young disabled people - have additional rights to make sure they are treated fairly and their needs are met.

Every child in the UK has been entitled to over 40 specific rights. These include:

- The right to life, survival and development
- The right to have their views respected, and to have their best interests considered at all times
- The right to a name and nationality, freedom of expression, and access to information concerning them
- The right to live in a family environment or alternative care, and to have contact with both parents wherever possible
- Health and welfare rights, including rights for disabled children, the right to health and health care, and social security
- The right to education, leisure, culture and the arts
- Special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual or other forms of exploitation

The rights included in the convention apply to all children and young people, with no exceptions.

The above and more information can be found at [Direct Gov](#).

Q3
Does the policy,
strategy, function,

Yes/No

Use your evidence from Q2 to state why

<p>project, activity, or programme make a positive contribution to equalities?</p>	
<p>Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity and/or human rights?</p>	<p>Yes/No</p> <p>If the answer here is 'yes', then it is necessary to go ahead with a Full Equality Impact Analysis. You should also consider a Full Equality Impact Analysis if your decision is likely to be of high relevance to equality, and/or be of high public interest.</p>