

# Cabinet

23 April 2012

## EQUALITIES IMPACT ASSESSMENTS

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## Initial Screening Equality Impact Analysis Tool

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>
<b>Financial Year and Quarter</b>	2012/13 1 <sup>st</sup> Quarter
<b>Name of policy, strategy, function, project, activity, or programme</b>	New contract and framework agreement for The Provision of Service for Face to Face Customer Transactions – due to commence mid May 2012.
<b>Q1 What are you looking to achieve?</b>	<p>The Contract for the Provision of Service for Face to Face Customer Transactions represents an essential component of the Council's ongoing customer access strategy and an important way to deliver significant future savings by reducing cost per transaction charges. The contract incorporates the Council's in house face to face transactional activities in addition to high volume payment services for council tax and housing rents, processed via intermediaries, and currently managed through two separate contracts.</p> <p>The majority of the Council's in house face to face transactional services are carried out through one delivery point by the Pay and Park section, H&amp;F Direct. These include cashiering services via a payment kiosk and the boroughs parking permit services.</p> <p>Further, the Council offers a number of payment options to customers to ensure optimum collection rates. Payments for council tax and housing rent can be made through third party outlets, via intermediaries, and the Council has been managing this provision by means of two separate contracts.</p> <p>During recent years, face to face provision via Pay and Park has reduced dramatically and now only accounts for 8% of transactions processed however, the Council recognises that it will continue to be a preferred channel for some of our customer groups and transactions. In addition, as current contracted rates are driven by volume, it is suggested that there is a need to optimise our position in the market by eliminating charges to intermediaries and moving transactional services under one umbrella.</p>

Following a full and open tender process, the Council is now seeking approval to award the contract and framework agreement to Post Office Ltd who will supply a face to face offering for a range of transactional activities. The contract will encompass a range of payment and check and send facilities currently carried out by Pay and Park and other Council services. It will also eliminate the existing contractual arrangements in respect of housing rents and council tax by placing face to face transactional services under one contract. It is intended that inbound payment transactions will be the first group to transfer to the new contract with additional services phased in as supported by an appropriate business case.

As part of the development of the contract, prospective tenders were scored on their ability to deliver services in such a way that takes into account the diversity of the borough. The Public Sector Equality Duty ('PSED') is a non-delegable duty, and the Council retains ultimate responsibility for the accessibility of services. The successful tenderer, Post Office Ltd, is committed to complying with the Council's requirements to promote a borough of opportunity and will be required to maintain this compliancy as required by the Council throughout the 4 year term of the contract.

In addition, it was also considered that service users would benefit from having more than one service delivery point to carry out their transactions. In view of this it was a requirement for the tenderer to have the ability to provide face to face transactional services from six or more establishments located across the borough.

The decision to withdraw inbound face to face payments for all services, with the exception of parking permits and penalty charge notices via Pay and Park, may be unpopular but this action should be mitigated by the introduction of multiple service delivery points located across the borough.

**Q2  
Who in the main will  
benefit?**

The award of the Contract for the Provision of Service for Face to Face Customer Transactions will positively benefit all groups and is anticipated to have no impact at all on the majority of current face to face service users. The new contract will allow service users to access the Councils face to face transactional services via 17 Post Offices across the borough, resulting in improved services and greater accessibility across all groups. At the same time it will offer the opportunity to combine H&F transactions with other services provided by the Post Office.

Post Office Ltd is a very well established and trusted organisation that the public already associate with Central and Local Government Services. This should give reassurance to our customers that their transactions will be dealt with by a very experienced and approachable service provider and the largest, most accessible retail network in the UK. In addition, although residual payment transactions will cease to be processed via Pay and Park upon implementation of the new contract, our customers will no longer have to use a self service payment kiosk to carry out their transaction and will have the opportunity to enjoy a more localised face to face service at any one of 17 Post Office branches across the borough.

Residents making payments through third party outlets via the Councils current contractual arrangements will, in the main, see little difference with the new contract. In 2010/11, of the 256,000 payments processed via this route, 94% of the transactions were carried out in a Post Office branch. In view of this, the transfer to a Post office operated contract should be a seamless process with minimal impact.

An accessibility matrix was supplied by the Post Office with tender paper work covering all 17 branches (appendix A). In addition, further information is available from the Post Office website and Post Office Ltd has confirmed that they are happy to work with the Council and any interested groups.

### **All protected groups**

Because the new contract does not make any change to policy, and because it provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient, there are positive impacts for all groups. However, the fact that the service will be available from more locations, will be of more relevance to some groups than to others e.g. older and disabled people who find moving about the borough less easy than other people, and who will find the increase in local services to be more beneficial.

The successful tenderer, Post Office Ltd, is committed to complying with the Council's requirements to promote a borough of opportunity and will be required to maintain this compliancy as required by the Council throughout the 4 year term of the contract.

























The Post Office Ltd is a well established and trusted organisation that most people recognise and this should offer reassurance to all service users.

Age	As given above, this will have more relevance to older people who may have mobility difficulties and as such will experience more of a benefit than others by having more local options to access our services. This will also be true for younger adults with children, who will have more local options and therefore not have to travel as far with children, which will free up time for them.	MEDIUM	Positive
Disability	As given above, this will have more relevance to disabled people who may have mobility difficulties and as such will experience more of a benefit than non-disabled people by having more local options to access our services. The accessibility matrix helped to inform the evaluation of the contract and provides assurance and information on accessibility for disabled people.	MEDIUM	Positive

	Gender reassignment	The new contract provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient. It is not of particular relevance to this protected characteristic but will have a small positive impact.	LOW	Positive
	Marriage and Civil Partnership	The new contract provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient. It is not of particular relevance to this protected characteristic because the services are not provided in a different way to married people than they are to civil partners but it will have a small positive impact.	LOW	Positive
	Pregnancy and maternity	As given under Age, this will have more relevance to people who may have limited mobility and as such will experience more of a benefit than others by having more local options to access our services. This can include pregnant women and those with small infants, who will now have more local options and therefore not have to travel as far with children, which will free up time for them.	MEDIUM	Positive
	Race	The new contract provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient. It is not of particular relevance to this protected characteristic but will have a small positive impact.	LOW	Positive
	Religion/belief (including non-belief)	The new contract provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient. It is not of particular relevance to this protected characteristic but will have a small positive impact.	LOW	Positive
	Sex	As given above under Age, this will have more relevance to men and women with children, who will have more local options and therefore not have to travel as far with children, which will free up time for them.	MEDIUM	Positive

	Sexual Orientation	The new contract provides greater accessibility to face to face transactional services by offering 17 service delivery points across the borough, making it more localised and convenient. It is not of particular relevance to this protected characteristic but will have a small positive impact.	LOW	Positive
<p><b>Human Rights and Children's Rights</b></p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>				
<p><b>Q3</b> Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes</p> <p>The new contract increases accessibility to the Council's face to face transactional services. This in turn assists some of our more vulnerable and disabled service users by localising services and introducing multiple access points. In addition, as face to face payment services can be accessed by everyone, it is likely to have a positive effect on all groups.</p>			
<p><b>Q4</b> 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>			



	Facilities for Visually Impaired or Blind
	Assistance Dogs Welcome
	Assisted Wheel Chair Access
	No Assisted Wheel Chair Access
	Facilities for the Mobility Impaired
	Customer Toilet Facilities
	Accessible Toilets
	Sign Language for Deaf People
	Facilities for Hard of Hearing People
	Induction Loops Available
	Customer Parking Facilities
	Accessible Parking Facilities
	Staff Assistance
	Low Payment Counters including clip boards, drop down counters, lap trays and portable chip and pin readers
	Parent with Pushchair Access
	Baby Changing Facilities
	Accessible Baby Changing Facilities
	Alternative Language Available
	Intercom Outside of the Premises
	Temporary Ramp Available
	Low Reception, Information Counters Available
	Automatic Doors Present
	Customer Lift Provided
	Accessible Lift Provided



## 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 5<sup>th</sup> 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](mailto:PEIA@lbhf.gov.uk) or ext 3430.

## Initial Screening Equality Impact Analysis Tool

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>
<b>Financial Year and Quarter</b>	2011/12, Q4
<b>Name of policy, strategy, function, project, activity, or programme</b>	This is an existing service, which is being reviewed in terms of the way it is provided by H&F. <b>Note:</b> If your proposed strategy will require you to complete an organisational change assessment report, please refer to the organisational change assessment (OCA) documentation accessed via the Smart HR web pages for additional guidance on assessing impact on staff. There is no impact on staffing as reductions of previous posts were made in May 2011.
<b>Q1 What are you looking to achieve?</b>	The main aim is to review the way in which the Archives service is provided and to review 5 options, and make a recommendation following review of those options. See accompanying Cabinet Report for more information.
<b>Q2 Who in the main will benefit?</b>	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may be in more than one protected characteristic). You should use this to determine whether the policy will have a positive/neutral/negative impact and whether it is of low/medium/high relevance to equality.</p> <p>You should also use this section when your policy may not be relevant to one or more protected characteristics. If this applies, case law has established that you must give your reasoning. It is not sufficient to state 'N/A' without saying why.</p> <p><b>Information: protected characteristics and PSED</b> The public sector equality duty (PSED) states that in the exercise of our functions, we must have due regard to the need to:</p> <ul style="list-style-type: none"> <li>▪ Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;</li> <li>▪ Advance equality of opportunity between people who share a protected characteristic and those who do not; and</li> <li>▪ Foster good relations between people who share a protected characteristic and those who do not.</li> </ul> <p>Having due regard for advancing equality involves:</p> <ul style="list-style-type: none"> <li>▪ Removing or minimising disadvantages suffered by people due to their protected characteristics;</li> <li>▪ Taking steps to meet the needs of people from protected groups where these are different from the</li> </ul>

- needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

The review looks at the following five options:

- LMA house the H&F Collection at their premises in Clerkenwell, City of London
- Service managed via a Tri-borough service
- H&F run the Archives service by recruiting an Archivist to staff the reading room and recruit volunteers
- H&F run the Archives service with volunteers only

These are analysed below under each protected characteristic

Age	Analysis of impact on age including due regard to PSED (above).		
	Option 1 LMA house the H&F Collection at their premises in Clerkenwell, City of London- this would involve greater distances to travel which might deter some one less mobile and it would also make the physical collection more difficult to access for homework projects.	L	+
	Option 2: Service managed via tri-borough service This option would be of low relevance to Age and would have little impact on the service user as the service would not change. It is expected that the service will be open more hours at the Lilla Husset Centre under this option which would have a positive impact.		
	Option 3: H&F run the Archives service by recruiting an Archivist to staff the reading room and recruit volunteers		

		<p>This option would be of low relevance to Age and would have little impact on the service user as the service would not change</p> <p>Option 4 H&amp;F run the Archives service with volunteers only This option would be of low relevance to Age and would have little impact on the service user as the service would not change.</p>		
	Disability	<p>Analysis of impact on disability including due regard to PSED (above).</p> <p>There would be no impact on disability except Option 1 LMA house the H&amp;F Collection at their premises in Clerkenwell which would involve greater distances to travel to access the collection. The recommended Option 2 would have a positive impact.</p> <p>Option 1 LMA house the H&amp;F Collection at their premises in Clerkenwell, City of London- this would involve greater distances to travel which might deter some one less mobile.</p> <p>Option 2: Service managed via tri-borough service This option would be of low relevance to Disability and would have little impact on the service user as the service would not change. It is expected that the service will be open more hours at the Lilla Husset Centre under this option which would have a positive impact.</p> <p>Option 3: H&amp;F run the Archives service by recruiting an Archivist to staff the reading room and recruit volunteers</p> <p>This option would be of low relevance to disability and would have little impact on the service user as the service would not change</p> <p>Option 4 H&amp;F run the Archives service with volunteers only This option would be of low relevance to Disability and would have little impact on the service user as the service would not change.</p>	L/M/H	+

Gender reassignment	Analysis of impact on gender reassignment including due regard to PSED (above). There would be no impacts under any of the 4 options	L/M/H	N/A
Marriage and Civil Partnership	Analysis of impact on marriage and civil partnership including due regard to PSED (above). None.	L/M/H	N/A
Pregnancy and maternity	Analysis of impact on pregnancy and maternity including due regard to PSED (above). There are no impacts except for Option 21LMA house the H&F Collection at their premises in Clerkenwell which would involve greater distances to travel to access the collection.	L/M/H	N/A
Race	Analysis of impact on race including due regard to PSED (above).  There would be no impacts on race by any option.	L/M/H	N/A
Religion/belief (including non-belief)	Analysis of impact on religion including due regard to PSED (above). There would be no impacts on religion by any option.	L/M/H	N/A
Sex	Analysis of impact on sex There would be no impacts on sex by any option.	L/M/H	N/A
Sexual Orientation	Analysis of impact on sexual orientation  There would be no impacts on sexual orientation by any option.	L/M/H	N/A

**Human Rights and Children's Rights**

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

Yes / No

	Will it affect Children's Rights, as defined by the UNCRC (1992)? Yes/No
<b>Q3</b> Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?	Yes/No  Does this provide an opportunity to promote equality? Use your reasoning from Q2 to state why.  The recommended Option 2 gives the opportunity using the expertise of the Westminster Archives staff, of opening the Lilla Husset centre more than it is at present and keeping the Archive collections within the boundaries of the borough, working with local volunteers to give them a role in running their Archives Service under the guidance of a professional archivist.
<b>Q4</b> 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?	Yes/No  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.

### Initial Screening Equality Impact Analysis Guidance

Section 01	Details of Initial Equalities Impact Screening Analysis
<b>Name of policy, strategy, function, project, activity, or programme</b>	<p>A <b>Policy</b> 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 <b>Strategy</b> 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 <b>Function</b> refers to any actions and/or activities designed to achieve a specific business benefit or goal.</p> <p>A <b>Project</b> 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 <b>Activity</b> is a specific task (or a groups of tasks) which can also form as part of a 'function'.</p> <p>A <b>Programme</b> 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><b>Q1</b> <b>What are you looking to achieve?</b></p>	<p>For example this might help to implement outcomes identified in policies such as the <a href="#">Single Equality Scheme</a>, <a href="#">Disability Equality Scheme</a>, <a href="#">other EIAs</a> in your service department, or in another department that your service/service users also interact with and draw down services from, <a href="#">Corporate Plan</a>, <a href="#">LAA Targets</a>, CAA Aims, <a href="#">UDP</a>, or <a href="#">JSNA</a>.</p>
<p><b>Q2</b> <b>Who in the main will benefit?</b></p>	<p>Hereafter, 'policy' means policy, strategy, function, project, activity, or programme Disabled and elderly and young children will be main beneficiaries if the recommended option 3 I accepted as the Lilla Husset Centre will open more hours and the collection will stay within the Borough's boundaries.</p> <p><b>Disability</b> 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"> <li>▪ Provide accessible communications?</li> <li>▪ Change how you collate and use data?</li> <li>▪ Revise how you involve service users?</li> </ul> <p>Analyse the impact of the policy on the <a href="#">protected characteristics</a> 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><b>High</b></p> <ul style="list-style-type: none"> <li>▪ The policy, strategy, function, project, activity, or programme is relevant to all or most parts of the general duty, and/or to human rights</li> <li>▪ There is substantial or a fair amount of evidence that some groups are (or could be) differently affected by it</li> <li>▪ There is substantial or a fair amount of public concern about it</li> </ul> <p><b>Medium</b></p> <ul style="list-style-type: none"> <li>▪ The policy, strategy, function, project, activity, or programme is relevant to most parts of the general duty,</li> </ul>

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

#### Low

- 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 <a href="#">Direct Gov</a> .
<b>Q3</b> <b>Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</b>	<b>Yes/No</b>  Use your evidence from Q2 to state why: The recommended Option 3 gives the opportunity using the expertise of the Westminster Archives staff, of opening the Lilla Husset centre more than it is at present and keeping the Archive collections within the boundaries of the borough, working with local volunteers to give them a role in running their Archives Service under the guidance of a professional archivist.
<b>Q4</b> <b>Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity and/or human rights?</b>	<b>No</b>  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.

## Equality Impact Analysis Initial Screening Tool with Guidance

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### 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](mailto:PEIA@lbhf.gov.uk) or ext 3430.

## Initial Screening Equality Impact Analysis Tool

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>			
<b>Financial Year and Quarter</b>	2012			
<b>Name of policy, strategy, function, project, activity, or programme</b>	Hammersmith Library Refurbishment, Section 106 monies			
<b>Q1 What are you looking to achieve?</b>	To improve the customer experience with the refurbishment of the library, accessibility and signage			
<b>Q2 Who in the main will benefit?</b>	All library users and staff			
	Age	The refurbishment of the library will include all age groups and there will be benefits for all ages.	L	+
	Disability	All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic	L	+
	Gender reassignment	All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic	L	+
	Marriage and Civil Partnership	n/a	L	+
	Pregnancy and maternity	All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic	L	+

	Race	All improvements made as part of the refurbishment will comply with the T Equality Act 2010 in respect of this protected characteristic	L	+
	Religion/belief (including non-belief)	All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic	L	+
	Sex	All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic	L	+
	Sexual Orientation	<b>All improvements made as part of the refurbishment will comply with the Equality Act 2010 in respect of this protected characteristic</b>	L	+
<p><b>Human Rights and Children's Rights</b></p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>				
<b>Q3</b> Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?	Yes			
<b>Q4</b> Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or	No			

**adversely impact human rights?**

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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 5<sup>th</sup> 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](mailto:PEIA@lbhf.gov.uk) or ext 3430.

## Full Equality Impact Analysis Tool

<b>Overall Information</b>	<b>Details of Full Equality Impact Analysis</b>		
<b>Financial Year and Quarter</b>	2012/13 Quarter 1		
<b>Name and details of policy, strategy, function, project, activity, or programme</b>	<p>Fulham Court and Barclay Close Investment Plan</p> <p>This is an investment strategy for two housing estates in the borough.</p>		
<b>Lead Officer</b>	<p>Name: Neil Kirby                  Position: Interim Senior Regeneration Manager                  Email: neil.kirby@lbhf.gov.uk                  Telephone No: 8753 1722</p>		
<b>Date of completion of final EIA</b>	09/03/2012		

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<b>Section 02</b>	<b>Scoping of Full EIA</b>			
<b>Plan for completion</b>	<p>The EIA on the Investment Plan is set out below. Approval to this plan is expected to be granted by Cabinet on 16<sup>th</sup> April 2012.</p> <p>Lead Officer: Neil Kirby</p>			
<b>What is the policy, strategy, function, project, activity, or programme looking to achieve?</b>	<p>Area-based improvements                  This Investment Plan is designed to address the physical, social and economic issues facing the residents of the Fulham Court and Barclay Close Estates. The Investment Plan is based on consultation with local residents and key stakeholders.</p>			
	Age	The Investment Plan is aimed at improving two deprived Council estates and the lives and living environment of their residents. Many children and young people as well as elderly residents live on Council estates and would therefore be directly in line to benefit from expected gains.	H	+



	<p>High impact can be expected for children and young people. On Fulham Court, 32% of residents are aged 18 and under. Among the improvements that could benefit children and young people are enhanced play facilities, access to employment and training and outreach to reduce overcrowding. In addition a youth group is being facilitated on the estate.</p> <p>Medium impact can be expected for older residents. Public realm improvements such as paving and lighting will improve their local environment and reduce the fear of crime.</p>		
Disability	<p>People with disabilities and physical or mental ill health are disproportionately represented in Council housing.</p> <p>Disabled residents can be expected to benefit directly from the Investment Plan through improved public realm and increased access to job and training opportunities.</p>	M	+
Gender reassignment	There is very little data on gender re-assignment of Council tenants or members of their household. That said, the effects of this policy are expected to be neutral in terms of this characteristic.	L	Neutral / +
Marriage and Civil Partnership	The Council has limited data on the marital status of its tenants or members of their households. That said, the effects of this policy are expected to be neutral in terms of this characteristic.	L	Neutral / +
Pregnancy and maternity	<p>The Council has limited data on the proportion of its tenants or members of their household in this equalities category. It is known that there is a high proportion of teenage pregnancy in the w3ard.</p> <p>The proposals to build on the services available at the Tudor Rose Children's Centre will benefit both pregnant and new mothers</p>	M	+
Race	Residents from minority (non-white) backgrounds account for over a third of the resident population of Fulham Court Estate. The proportion of residents on Fulham Court Estate who are from black / black British backgrounds at 20% exceeds the Borough average.	M	+

	<p>Among the proposals that could particularly benefit black and ethnic minority residents are</p> <ul style="list-style-type: none"> <li>• Access to employment and training</li> <li>• Initiatives to reduce overcrowding</li> <li>• Community development activities to increase involvement of different communities and develop a higher level of community cohesion</li> <li>• Access to increased housing opportunities</li> </ul>		
Religion/belief (including non-belief)	Although the majority of the residents of the estates are Christian, the proportion of Muslim residents is higher than the borough average. The effects of this Investment Plan are expected to be neutral in terms of this characteristic.	L	Neutral / +
Sex	<p>Women could be expected to benefit from estate improvements that reduce crime and asb.</p> <p>Men of working age from black and ethnic minority backgrounds are proportionately less likely to be in employment than other groups when considered in terms of race and gender and therefore, could be more likely to benefit from proposed training and employment initiatives.</p>	M	+
Sexual Orientation	The Council has limited data on the breakdown of its tenants and their household members by sexual orientation. That said, the effects of this Investment Plan are expected to be neutral in terms of this characteristic.	L	Neutral / +

### Human Rights and Children's Rights

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

Yes. Article 6: Right to a fair trial (to have your views heard), Article 8 (Right to respect for your family, home and correspondence), article 14 (Right to freedom from discrimination in respect of these rights and freedoms), Article 1 of Protocol 1 (Right to peaceful enjoyment of your property). It is considered that these would be positively impacted by the proposed policy.

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

Yes. The right to life, survival and development and the right to have their views respected and to have their best interests considered at all times. It is considered that these would be positively impacted by the Investment Plan.

<b>Documents and data reviewed</b>	
<b>New research</b>	No new research was undertaken.

<b>Section 04</b>	<b>Undertake and analyse consultation</b>
<b>Consultation</b>	Consultation with residents and service providers on the key elements of the Investment plan has taken place.
<b>Analysis</b>	The consultation confirmed that the Investment Plan would address the key physical, social and economic issues affecting the residents of these estates.

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	The analysis that has been undertaken does not indicate lawful or unlawful discrimination.

<b>Section 06</b>	<b>Reducing any adverse impacts</b>
<b>Outcome of Analysis</b>	Results driven outreach employment services Help for people with disabilities to find and stay in jobs

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>						
	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	Lack of engagement of bme	Letter to all residents inviting them to a	February 2012	Neil Kirby	Resident involvement is more	February 2012

	communities in existing structures for discussing the priorities for the estate	workshop. Build on community links made by the Children's Centre.			representative of the different communities on the estates.	
	Lack of engagement of young people in discussing the priorities for the estates.	Use the Council systems of youth involvement to facilitate a youth forum.	February 2012	Neil Kirby and Brenda Whinnett	Increased youth involvement including input into design of new community facilities	February 2012

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
<b>Chief Officer sign-off</b>	Name: Melbourne Barrett Position: Executive Director of Housing and Regeneration Email: <a href="mailto:melbourne.barrett@lbhf.gov.uk">melbourne.barrett@lbhf.gov.uk</a>  Telephone No: x4228
<b>Key Decision Report</b>	Date of report to Cabinet/Cabinet Member: 16/04/2012 Confirmation that key equalities issues found here have been included: Yes
<b>Opportunities Manager for advice and guidance only</b>	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 01.02.2012 Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a> Telephone No: 020 8753 3430

Are there any potentially negative aspects at all? If there are then we do need to say as otherwise - especially if this is controversial - it will hinder us in demonstrating that we have had due regard to the duty. A small one might be any disruption while works are carried out to improve the public realm.

You also need the date of the final completion of the EIA on p2

Do you need any actions at all? The action plan is blank. E.g. will you be communicating with residents as to when works will be carried out, a timetable for implementation of any of the plans?

Section 08 of the EIA will need:

- a Head of Service, AD, or Director for sign-off
- you will need to confirm that EQ summary is in the Report to Cabinet

**Initial Screening Equality Impact Analysis Tool**

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>			
<b>Financial Year and Quarter</b>	20012 to 20017			
<b>Name of policy, strategy, function, project, activity, or programme</b>	5 Year Contract for Servicing and Maintenance of Fire Fighting Equipment to Housing Properties Boroughwide			
<b>Q1 What are you looking to achieve?</b>	To carry out the service and maintenance of fire fighting equipment to Council housing premises across the borough. The proposed works consist of the regular servicing and repair to dry and wet risers, hose reels, fire extinguishers, fire blankets and sprinkler systems.			
<b>Q2 Who in the main will benefit?</b>	All users of the Councils services will benefit as the Contract provides essential safety support services.			
	Age	These works will benefit all residents regardless of their age.	H	+
	Disability	These works will benefit all residents regardless of their disability	H	+
	Gender reassignment	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	H	+
	Marriage and Civil Partnership	These works will benefit all residents regardless of their marriage/civil partnership status.	H	+
	Pregnancy and maternity	These works will benefit all residents and do not discriminate against any residents who may be in this protected characteristic.	H	+

	Race	These works will benefit all residents regardless of their race.	H	+
	Religion/belief (including non-belief)	These works will benefit all residents regardless of their religion.	H	+
	Sex	These works will benefit all residents regardless of their sex.	H	+
	Sexual Orientation	These works will benefit all residents regardless of their sexual orientation.	H	+
<p><b>Human Rights and Children's Rights</b></p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>				
<p><b>Q3</b> Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes</p> <p>The works will benefit all residents equally.</p>			
<p><b>Q4</b> 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 Guidance

Section 01	Details of Initial Equalities Impact Screening Analysis
<p><b>Name of policy, strategy, function, project, activity, or programme</b></p>	<p>A <b>Policy</b> 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 <b>Strategy</b> 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 <b>Function</b> refers to any actions and/or activities designed to achieve a specific business benefit or goal.</p> <p>A <b>Project</b> 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 <b>Activity</b> is a specific task (or a groups of tasks) which can also form as part of a 'function'.</p> <p>A <b>Programme</b> 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><b>Q1</b> <b>What are you looking to achieve?</b></p>	<p>For example this might help to implement outcomes identified in policies such as the <a href="#">Single Equality Scheme</a>, <a href="#">Disability Equality Scheme</a>, <a href="#">other EIAs</a> in your service department, or in another department that your service/service users also interact with and draw down services from, <a href="#">Corporate Plan</a>, <a href="#">LAA Targets</a>, CAA Aims, <a href="#">UDP</a>, or <a href="#">JSNA</a>.</p>
<p><b>Q2</b> <b>Who in the main will benefit?</b></p>	<p>Hereafter, 'policy' means policy, strategy, function, project, activity, or programme</p> <p><b>Disability</b> 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"> <li>▪ Provide accessible communications?</li> <li>▪ Change how you collate and use data?</li> </ul>



- Revise how you involve service users?

Analyse the impact of the policy on the [protected characteristics](#) with due regard to the Public Sector Equality Duty.

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?:

### High

- 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

### Medium

- 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

### Low

- 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.

	<p><b>Children’s Rights (UNCRC)</b>  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.</p> <p>Every child in the UK has been entitled to over 40 specific rights. These include:</p> <ul style="list-style-type: none"> <li>▪ The right to life, survival and development</li> <li>▪ The right to have their views respected, and to have their best interests considered at all times</li> <li>▪ The right to a name and nationality, freedom of expression, and access to information concerning them</li> <li>▪ The right to live in a family environment or alternative care, and to have contact with both parents wherever possible</li> <li>▪ Health and welfare rights, including rights for disabled children, the right to health and health care, and social security</li> <li>▪ The right to education, leisure, culture and the arts</li> <li>▪ 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</li> </ul> <p>The rights included in the convention apply to all children and young people, with no exceptions.</p> <p>The above and more information can be found at <a href="#">Direct Gov</a>.</p>
<p><b>Q3</b>  Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes/No</p> <p>Use your evidence from Q2 to state why</p>
<p><b>Q4</b>  Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of</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>

<b>opportunity and/or human rights?</b>	
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## 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 5<sup>th</sup> 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](mailto:PEIA@lbhf.gov.uk) or ext 3430.

## Initial Screening Equality Impact Analysis Tool

<b>Section 01</b>	<b>Details of Initial Equality Impact Screening Analysis</b>											
<b>Financial Year and Quarter</b>	2011 / Q2											
<b>Name of policy, strategy, function, project, activity, or programme</b>	Recharges Policy - New											
<b>Q1 What are you looking to achieve?</b>	To initiate a Recharges Policy which will allow the Council to recover unnecessary costs incurred by tenants' abuse or malicious damage.											
<b>Q2 Who in the main will benefit?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Age</td> <td style="width: 60%;"> <p>Analysis of impact on age including due regard to PSED (above).</p> <p>Information: Where age is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p> <p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through age alone may be covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to older people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p> </td> <td style="width: 10%; text-align: center;">M</td> <td style="width: 15%; text-align: center;">+ (on case by case basis)</td> </tr> <tr> <td>Disability</td> <td> <p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through disability are covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to disabled people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p> </td> <td style="text-align: center;">M</td> <td style="text-align: center;">+ (on case by case basis)</td> </tr> </table>				Age	<p>Analysis of impact on age including due regard to PSED (above).</p> <p>Information: Where age is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p> <p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through age alone may be covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to older people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p>	M	+ (on case by case basis)	Disability	<p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through disability are covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to disabled people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p>	M	+ (on case by case basis)
Age	<p>Analysis of impact on age including due regard to PSED (above).</p> <p>Information: Where age is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p> <p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through age alone may be covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to older people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p>	M	+ (on case by case basis)									
Disability	<p>Any tenants who are unable to meet their upkeep obligations as required by the tenancy agreement through disability are covered by the Discretionary Repairs Policy, and this will depend on a case by case basis. As such, the relevance to disabled people will vary, though it is expected that in general it will be of medium relevance. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case.</p>	M	+ (on case by case basis)									

	Gender reassignment	It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	N/A	N/A
	Marriage and Civil Partnership	It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	N/A	N/A
	Pregnancy and maternity	It is unlikely that a tenant responsibility for upkeep would have such urgency that it could not wait until after the time of pregnancy. If there were such an urgency, the Discretionary Repairs Policy would apply.	L	+
	Race	It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	N/A	N/A
	Religion/belief (including non-belief)	It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	N/A	N/A
	Sex	The Council recognises that women tend to live longer than men, and as such, this policy may apply to more women than men, but this would be expected in line with life expectancy differences. As such, women may benefit more than men in a proportionate way. this will depend on a case by case basis. As such, the relevance to Sex people will vary, though it is expected that in general it will be of low relevance because the primary relevance of the policy will be to older and disabled people. Additionally, for those that are covered by the Discretionary Repairs Policy, the impact would be positive but again this would depend on a case by case basis and there is no guarantee that the policy would apply in every case. It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	L	+ (on a case by case basis)

	Sexual Orientation	It is not expected that the policy will be of relevance to, or have any impact on, those with this protected characteristic	N/A	N/A
<b>Q3</b> <b>Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</b>	<p><b>Human Rights and Children's Rights</b></p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p> <p>Yes</p> <p>The Recharges policy is intended to be applied to all people fairly. It acknowledges that the elderly (frail) and the disabled may have difficulty in complying with their obligations for maintaining a property in good repair (especially decorative order). Further, this policy may apply to women more than to men because of the difference in life expectancy, though this would be proportionate and in line with expectations arising from this difference. In so doing, it allows for discretion to be applied under stated guidelines (Discretionary Repairs Policy)</p>			
<b>Q4</b> <b>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?</b>	<p>No</p> <p>The intention is that this policy will be fair to all residents.</p>			