

APPENDIX 1 - H&F Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has 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, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should 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.
5. 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 corporate equalities lead Peter Smith (Head of Policy & Strategy) peter.smith@lbhf.gov.uk or 07818 402486 for strategic advice.
6. More general advice and guidance can be accessed from the separate guidance document (on the intranet) or [ACAS - EIA](#). Or you can contact the officer below.

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H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	20 / 21 Q3
Name and details of policy, strategy, function, project, activity, or programme	<p><u>Title of EIA</u> Integrated Enforcement in H&F – Neighbourhood Enforcement Team</p> <p><u>Short summary</u> H&F is implementing a new integrated enforcement unit which will introduce uniformed officers who will patrol H&F's streets and housing estates to respond to anti-social behaviour and environmental crime, which will include: PSPO enforcement, highways and street trading enforcement, park patrols, enforcing littering and fly tipping legislation, dealing with commercial waste, rough sleeping patrols, etc. The new Neighbourhood Enforcement Team (NET) will work seven days a week and support the MPS in protecting residents from crime.</p> <p>The Neighbourhood Enforcement Team will merge several team functions - Neighbourhood Wardens, Parks Police, Street Scene Enforcement, Highways Enforcement and Market inspectors. Officers will provide the consistency and expertise to provide high visibility engagement and support to residents and provide the same approach when tackling persistent offending; particularly in known hotspots in the borough.</p> <p>As officers are highly visible authority figures they will also serve as community ambassadors engaging and providing reassurance to residents and members of the public. They will be trained to take reports of hate crime and provide signposting to both H&F and non-council hate crime services. Following reports, they will liaise with the Anti-Social Behaviour Unit and the Police to tackle hate crime based on race, religion, disability or sexual orientation. They will also be trained to identify other high-risk street-based concerns including adult/child safeguarding, homelessness, substance use, domestic abuse, modern slavery, serious youth violence/gangs and other forms of exploitation working closely with partners and council departments to link residents into appropriate services.</p> <p>The implementation and presence of the NET is expected to have a positive impact on residents by ensuring H&F is a safer and cleaner borough for all to enjoy. This EIA sets out the specific considerations in relation to those residents with one or more protected characteristics.</p>
Lead Officer	<p>Name: Matthew Hooper Position: Chief Officer - Safer Neighbourhoods & Regulatory Services Email: Matthew.Hooper@lbhf.gov.uk Telephone No: 07450 964 681</p>
Date of completion of final EIA	19/11/20

Section 02	Scoping of Full EIA		
Plan for completion	<p><u>Timing</u> This EIA was drafted to reflect Cabinet approval for the creation of the NET. This EIA will be used to inform the implementation and ongoing monitoring of the NET.</p> <p><u>Resources</u> This EIA is informed by relevant crime and performance data from the strategic assessment, borough profile, disproportionality report, PSPO consultation, police and business intelligence team data.</p>		
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.</p>		
	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
	Age	<ul style="list-style-type: none"> The NET will not negatively impact individuals based on age but may have a positive impact in safeguarding young people. Officer training will consider age when undertaking action and assessing individual cases. The NET will need to consider safeguarding implications for young people. The Net will offer a visible protection to all. Their presence will deliver several trusted adults in the community to young people who may be victims of crime, may be being exploited into/engaged in crime and provide adequate links into safeguarding and GVEU as appropriate. 	Positive
	Disability	<ul style="list-style-type: none"> The NET will not negatively impact individuals on the basis of disability but may have a positive impact in providing support to individuals with disabilities. The NET will need to ensure that individuals with particular disabilities, learning disabilities or mental health conditions are provided with appropriate and accessible information, guidance and support. This will be incorporated 	Positive

	<p>into officer training to ensure that disability and mental and physical wellbeing is taken into account by officers when assessing individual cases.</p> <ul style="list-style-type: none"> • The NET will be trained to identify and take reports of hate crime involving disability and will be able to refer into the Hate Crime Coordinator. This may increase disability hate crime reporting which is currently underreported and the lowest form of reported hate crime in H&F. • The increased visibility provided by the NET may improve identification of individuals being targeted by crime/ASB because of disability. 	
Gender reassignment	<ul style="list-style-type: none"> • The NET will not negatively impact upon individuals on the basis of gender reassignment. • The NET will be trained to identify and take reports of transphobic hate crime, although this hate crime is the lowest recorded hate crime type in H&F. 	Neutral
Marriage and Civil Partnership	<ul style="list-style-type: none"> • The NET may positively impact upon individuals on the basis of marriage and civil partnership. • The increased visibility of NET officers on streets and estates may be able to identify incidents of intimate partner domestic abuse occurring in public/street-based areas which may occur in the context of a marriage or civil partnership (5.7% adults experienced DA in the past year). 	Positive
Pregnancy and maternity	<ul style="list-style-type: none"> • The NET will not negatively impact upon individuals on the basis of pregnancy and maternity • Pregnancy and maternity will be taken into account by officers when assessing individual cases and where safeguarding concerns are identified appropriate action will be taken. 	Neutral
Race	<ul style="list-style-type: none"> • The NET may have both a positive and potentially negative impact upon BAME individuals, who are overrepresented as both victims and perpetrators in certain crime types and where there are lower levels of trust towards statutory/enforcement services. • The NET will need to ensure they undertake unconscious bias training and effective and ongoing community engagement with BAME individuals and communities to listen to what BAME communities have to say, increase confidence in council services / NET officers, and improve perceptions of safety. The NET will need to ensure effective monitoring and scrutiny to ensure there is no disproportionality in enforcement. • The NET will have a positive impact as officers will be trained to identify and 	Positive + Potentially negative

	<p>take reports of hate crime, of which race-related crime is the highest hate crime type in H&F.</p> <ul style="list-style-type: none"> The NET will have a positive impact on communities as, each ward, will have a minimum one dedicated officer who will become known to the residents, and the residents known to them allowing for trusted relationships to develop 	
Religion/belief (including non-belief)	<ul style="list-style-type: none"> The NET may positively impact upon individuals on the basis of religion/belief. The NET will have a positive impact as officers will be trained to identify and take reports of hate crime, of which race and religious are among the highest in H&F. 	Positive
Sex	<ul style="list-style-type: none"> The NET will not have a negative impact on individuals on the basis of sex. Women are disproportionately affected by domestic and sexual violence and NET officers will be trained to identify incidents which may occur in the public spaces. NET officers will provide increased visibility during evenings (up until 5am, Wed-Sun) providing safer streets for all, but recognising women's night-time safety in public places. 	Neutral
Sexual Orientation	<ul style="list-style-type: none"> The proposed extension of the PSPO will not negatively impact upon individuals on the basis of sexual orientation. The NET will have a positive impact as officers will be trained to identify and take reports of hate crime and respond to homophobic hate crime. 	Positive

***Groups that cross more than one strand**

It is important to recognise how individuals with multiple protected characteristics are impacted. For example, the NET will need to consider the impact on young, black (and other minority ethnic) individuals. There is an overrepresentation of the Black group of young offenders compared to local youth population in H&F. In H&F the rate of overrepresentation of BAME young people has been above the London and National rates.

***Other considerations**

While it is not a protected characteristic, the impact of the NET on those with existing vulnerabilities surrounding homelessness and problematic alcohol / substance use should also be considered. These vulnerabilities will be taken into account by officers when assessing individual cases. This will also be incorporated into training and guidance and training will be given to officers to ensure that those who are experiencing homelessness or problematic alcohol or substance use are referred into the appropriate safeguarding mechanisms and provided with appropriate offers of support.

	<p>Where there are concerns re problematic alcohol use, substance misuse the approach of the NET will be in line with broader enforcement approaches within the Community Safety Unit where education and referral to treatment services is of the highest importance.</p> <p>Human Rights or Children’s Rights If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Equality Lead for advice</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>
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Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	Data from the 2018 borough profile, strategic assessment, police statistics have been reviewed.
New research	Monitoring and performance data in relation to enforcement, engagement and protected characteristics should inform the ongoing implementation and operation of the NET.

Section 04	Consultation
Consultation	Details of consultation findings (if consultation is required. If not, please move to section 06)
Analysis of consultation outcomes	Consultation not required

Section 05	Analysis of impact and outcomes
Analysis	Consultation not required

Section 06	Reducing any adverse impacts and recommendations
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Outcome of Analysis

Actions are detailed in the action plan below. General actions to reduce the risk of adverse impacts on any specific groups include:

Robust Training and Procedures

- NET officers will be provided with a robust training package on key issues relating to: ASB, enforcement, safeguarding, unconscious bias, hate crime, available support. This training will be classroom based and include a range of providers delivering specialist information
- Development of robust operational policies and procedures will be introduced during mobilisation and, where appropriate, published on the NET web pages for residents to see in an open and transparent approach
- The NET staff will be trained and given access to, and adhere to existing policies and processes (e.g. PSPO enforcement plan) and their respective governance procedures
- All NET staff will be accredited

Monitoring and Scrutiny

- NET staff will record interactions, engagement and enforcement with residents and MOP
- Ongoing monitoring and scrutiny of performance
- Use of body worn video to ensure the safety of authorised officers and residents and to provide evidence and transparency
- Targeted, intelligence-led identification of hotspots and enforcement
- Live on street supervision and tasking of staff through GPS tracking, body cameras and mobile IT
- Transparency – a formal process for tasking resources on a monthly basis using complaints data and input from elected members

Community Engagement and Support

- NET will engage with communities to improve confidence and public perception
- NET will engage with communities to improve confidence in reporting
- Communication and engagement plan develop for communities but with focus on young people
- NET officers will be knowledgeable on available support services/pathways in the borough.
- NET officers will undertake support, not just enforcement (e.g. Welfare checks, rough sleeping patrols)

Partnership

- NET officers will work closely with key departments and agencies to ensure the right interventions are identified
- NET officers will undertake a coordinated approach to engagement, support and enforcement.

Recruitment and Staffing

- Where new officers are recruited, care will be taken to ensure a diverse NET team

Section 07 **Action Plan**

Action Plan

Note: You will only need to use this section if you have identified actions as a result of your analysis

Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan
Supporting young people who may be involved in ASB, victims of ASB or where safeguarding concerns are identified by NET officers	<ul style="list-style-type: none"> - Officers to receive safeguarding training - Officers to have thorough understanding of, and work closely with, key departments working with CYP (GVEU, CSC) - Communication and engagement plan for work with young people - Evidence-led tasking - Engagement with young people in both formal and informal settings 	Implementation and ongoing	Head of Community Safety and Neighbourhood Enforcement Manager	<ul style="list-style-type: none"> - CYP diverted into appropriate support - CYP safeguarded - Opportunities for early intervention - To ensure there is not a disproportionate impact on CYP - Officers build relationships with YP and understand their concerns 	To be added following Cabinet on 7 th December
Additional vulnerabilities and support needs of those with disabilities, learning disabilities or mental health issues.	<ul style="list-style-type: none"> - Possible disabilities, learning disabilities or mental health conditions will be considered by officers when assessing individual cases and whether to take enforcement action. - Any written information made available in an 	Implementation and ongoing	Head of Community Safety and Neighbourhood Enforcement Manager	<ul style="list-style-type: none"> - To ensure enforcement action does not have a disproportionate impact on those with disabilities, learning disabilities or mental health issues 	To be added following Cabinet on 7 th December

		<ul style="list-style-type: none"> - accessible format - This will be incorporated into officer training to ensure that disability and mental and physical wellbeing is considered by officers when assessing individual cases. - Training to identify hate crime and how to take reports - Evidence led tasking 			<ul style="list-style-type: none"> - To ensure those who may be targeted as victims of ASB or crime because of or who have disability are linked into support. 	
	Addressing potential impact on BAME individuals; distrust of statutory/enforcement services and disproportionality in enforcement.	<ul style="list-style-type: none"> - Officers will undertake unconscious bias training - NET officers will be from diverse backgrounds - Robust and transparent processes/protocols - Use of body worn - Live supervision and tasking - Monitoring and scrutiny - Accurate recording of information - NET officers will undertake community engagement activities - Communication and engagement plan - Complaints data used to monitor performance - Evidence led tasking 	Implementation and ongoing	Head of Community Safety and Neighbourhood Enforcement Manager	<ul style="list-style-type: none"> - Increase BAME confidence in NET - Increased safety for BAME individuals and communities - Ensure proportionality 	To be added following Cabinet on 7 th December

	Additional vulnerabilities and support needs of those experiencing homelessness or with problematic substance use	<ul style="list-style-type: none"> - Additional vulnerabilities surrounding homelessness will be considered by officers when assessing individual cases and whether to take enforcement action. - Authorised officers to be given information and support packs which can be given to those who officers believe are homeless. - Authorised officers to be trained on process for ensuring appropriate support is offered to those who officers believe are homeless - Evidence led tasking 	Prior to implementation and ongoing	Head of Community Safety and Neighbourhood Enforcement Manager	<ul style="list-style-type: none"> - To ensure enforcement action does not have a disproportionate impact on those who are homeless 	To be added following Cabinet on 7 th December
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Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Matthew Hooper Position: Chief Officer, Safer Neighbourhoods & Regulatory Services Email: matthew.hooper@lbhf.gov.uk Telephone No: 020 8753 5809 Considered at relevant SLT: 28.10.20
Key Decision Report (if relevant)	Date of report to Cabinet: 7.12.20 Key equalities issues have been included: Yes