

H&F Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EIA 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 is informed by the [public sector equality duty](#) which came into force in April 2011. 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 the Equality Act 2010**
- 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 these three tenets.

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 Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	FY25/26 Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: CCTV– new innovations and improved infrastructure to help combat crime and anti-social behaviour</p> <p>The Council are investing from 2025–2028 to upgrade its extensive CCTV network, which already includes over 2,000 fixed cameras and 38 deployable units. Enhancements include:</p> <ul style="list-style-type: none"> • Speakers and spotlights at 100 camera sites • New multi-directional and 360° cameras • Drone trial (subject to CAA approval) • Additional redeployable cameras <p>This initiative supports the Council’s commitment to public safety, crime prevention, and community wellbeing.</p>
Lead Officer	<p>Name: Adrian Rutkowski Position: CCTV Manager Email: adrian.rutkowski@lbhf.gov.uk</p>
Date of completion of final EIA	3.11.2025

Section 02	Scoping of Full EIA		
Plan for completion	Timing/Resources: The EIA has been completed prior to procurement and will continue to be updated throughout the project through to deployment		
Analyse the impact of the policy, strategy, function, project, activity, or programme	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
	Age	Impact on vulnerable children – there is a positive impact towards the early location of vulnerable children. Support safeguarding measures to reduce a child’s exposure to CSE, abuse or neglect Older adults and young people will benefit from safer public spaces, especially in parks and high-footfall areas.	Positive Positive
	Disability	Improved lighting and audio warnings support accessibility for visually and hearing-impaired individuals.	Positive
	Gender reassignment	The implementation will not negatively impact upon individuals on the basis of their gender reassignment. If an individual is identified on the CCTV network is not dependent on their gender reassignment and this information will not be known to the operator. Research completed by the National LGBT survey, Government Equalities Office, shows that the transgender community are more likely to be victims of ASB in public spaces. Officers will be able to take action against groups causing ASB in public spaces making it safer for the transgender community.	Neutral Positive

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	Marriage and Civil Partnership	The implementation will not negatively impact upon individuals on the basis of marriage and civil partnership. If an individual is identified on the CCTV network is not dependent on their marriage or civil partnership status and this information will not be known to the operator.	Neutral	
	Pregnancy and maternity	The implementation will not negatively impact upon individuals on the basis of pregnancy and maternity. If an individual is identified on the CCTV network is not dependent on the basis of pregnancy or maternity and this information will not be known to the operator.	Neutral	
	Race	<p>According to the 2021 Census, LBHF is more diverse than 10 years ago with 46% of the population born outside of the UK (London 41%), an increase from 43% in 2011.</p> <p>In Hammersmith & Fulham, 63.2% of people identified as 'white' and 36.8% identified as Black, Asian or minority Ethnic. In H&F, the main multi-ethnic groups in the borough identified are Black African (7.2%), Mixed (6.7%), Black Caribbean (3.6%) and Arab (3%).</p> <p>Many of the proposed camera/speaker/spotlight locations (e.g., Shepherd's Bush) are areas with high Black and multi-ethnic populations. This could lead to disproportionate surveillance and enforcement.</p> <p>However, there is a significant positive impact on public safety for all communities where new camera/speaker/spotlights are installed.</p> <p>Strong and robust safeguards will be in place to mitigate these risks.</p>	<p>Negative</p> <p>Positive</p>	

	Religion/belief (including non-belief)	<p>The implementation will not negatively impact upon individuals on the basis of their religion or belief.</p> <p>Religion/Belief: Increased security near places of worship helps prevent targeted abuse and supports peaceful gatherings.</p>	Neutral		
			Positive		
	Sex	<p>The implementation will not negatively impact upon individuals on the basis of their sex.</p> <p>Enhanced surveillance deters harassment and supports safer environments for women.</p>	Neutral		
			Positive		
	Sexual Orientation	<p>The implementation will not negatively impact upon individuals on the basis of sexual orientation.</p> <p>If an individual is identified on the CCTV network is not dependent on their sexual orientation and this information will not be known to the operator.</p>	Neutral		
			Neutral		
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Potential Risks and Mitigation Measures					
Risk	Description	Mitigation			
Privacy Concerns		Residents are informed that CCTV is in operation.			

		Additional cameras being installed in the borough some with additional capabilities	
	Disproportionate Monitoring	Certain groups may feel unfairly targeted.	Ensure monitoring is behaviour-based; maintain oversight and community engagement; ensure comms material is communicated appropriately.
	Accessibility Limitations	Audio/visual alerts may not suit all disabilities.	Design inclusive systems; consult disability advocacy groups.
	Misuse of Technology	Potential for misuse by operators or third parties.	Train staff; implement usage logs; enforce accountability protocols; ensure robust system security.
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Governance and Legal Compliance			
<ul style="list-style-type: none"> • UK GDPR & Data Protection Act 2018: All data processing will be lawful, necessary, and proportionate. • Right to Rectification: Residents can challenge and correct identification errors. 			
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			
Will it affect Human Rights, as defined by the Human Rights Act 1998?			

	<p>Yes –introduced improperly, could adversely affect the Article 8 right to privacy. However, we evaluate that there will be no such impact, due to introduction of robust DPIAs and impact assessments and our commitment to compliance with UK GDPR and data protection laws.</p> <p>Will it affect Children’s Rights, as defined by the UNCRC (1992)? Yes/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	Feedback and a review of a pilot project previously conducted in LBHF has been used to inform this procurement.
New research	No new research

Section 04	Consultation
Consultation	
Analysis of consultation outcomes	

Section 05	Analysis of impact and outcomes
Analysis	

Section 06	Reducing any adverse impacts and recommendations
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Outcome of Analysis	<p>The enhanced CCTV infrastructure project in Hammersmith & Fulham is expected to deliver significant positive outcomes for public safety and community wellbeing helping to reduce crime and ASB. By investing in additional lighting and audio capabilities, the system will enable faster detection and response to incidents, particularly benefiting vulnerable groups such as the elderly, disabled individuals, and those at risk of harassment or violence. The deployment of new cameras in high-footfall areas will help deter antisocial behaviour and crime.</p> <p>We recognise that the project introduces complex operational requirements particularly around privacy, data protection, Without robust safeguards, there is a risk of disproportionate surveillance or misidentification, especially for residents from ethnic minority backgrounds or those with disabilities. To mitigate these risks, the Council has committed to transparency, community engagement, and ethical oversight, including regular audits and consultation with equality groups. If implemented responsibly, the project has the potential to create safer, more inclusive public spaces while maintaining public trust and upholding residents' rights.</p>
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Section 07	Action Plan
Action Plan	<p>Following the procurement and implementation it may be necessary to have a communication campaign to inform residents of how new investments will be used and the impact they will have. It will be necessary to ensure that this campaign is targeted towards all residents.</p> <ol style="list-style-type: none"> 1. Inclusive Communication Campaign <ul style="list-style-type: none"> • Explore development of widespread messaging for all communities within LBHF. • Use accessible formats: Easy Read, audio, BSL, translated materials. • Include myth-busting content to address concerns around surveillance, bias, and data use. 2. Community Engagement and Trust Building <ul style="list-style-type: none"> • Publish a plain-language summary of the EIA and DPIA on the council website. 3. Staff Training and Accountability <ul style="list-style-type: none"> • Deliver mandatory training for CCTV operators and enforcement staff on: <ul style="list-style-type: none"> ○ Equality Act 2010 ○ Cultural humility, respectful handling and safeguarding • Implement usage logs and audit trails to monitor operator decisions and flag anomalies. 4. Evaluation and Continuous Improvement

	<ul style="list-style-type: none"> • Review the EIA annually or after any significant incident or complaint. • Include feedback mechanisms for residents to report concerns or request corrections. • Collaborate with academic or civil society partners for independent evaluation.
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Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Neil Thurlow Position: Assistant Director Community Safety, Resilience and CCTV Email: neil.thurlow@lbhf.gov.uk Telephone No: 07788 380 249
Key Decision Report (if relevant)	Date of report to Cabinet Member: 05/12/25 Key equalities issues have been included: Yes/No
Equalities Advice (where involved)	NA