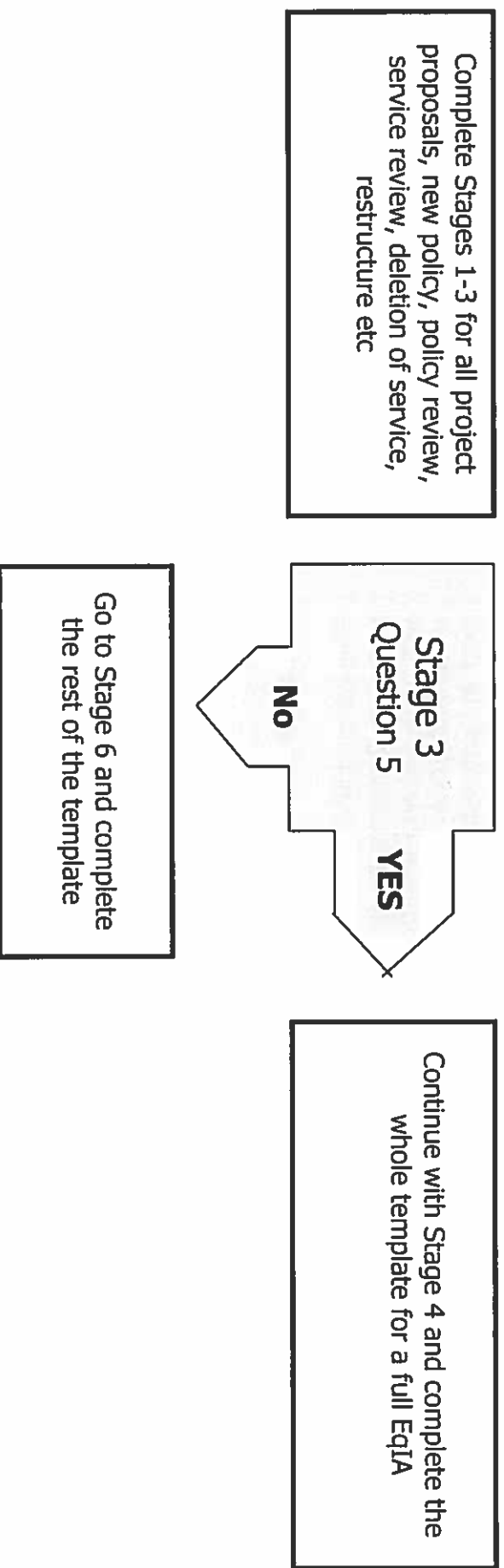


Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process (EqIA). There is now just one Template. Lead Officers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- **SIGN OFF:** All EqIAs need to be signed off by your Directorate Equality Task Groups. EqIAs relating to Cabinet Reports need to be submitted to the EqIA Quality Assurance Group at least one month before your Cabinet Report date. This group meets on the first Monday of each month.
- Legal will **NOT** accept any reports without a fully completed, Quality Assured and signed off EqIA.

The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

Equality Impact Assessment (EqIA) Template

Type of Decision: Tick ✓	x	Cabinet	Portfolio Holder	Other (explain)
Date decision to be taken:				
Value of savings to be made (if applicable):	This policy promotes income generation			
Title of Project:	Street Trading Policy			
Directorate / Service responsible:	Environment and Enterprise			
Name and job title of Lead Officer:	Jackie Barry-Purcell Policy and Funding Office, Environment and Enterprise			
Name & contact details of the other persons involved in the assessment:	Hanif Islam – Policy and Performance Manager, Environment and Enterprise			
Date of assessment (including review dates):	01/06/2015			

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>To introduce a Street Trading Policy in Harrow.</p> <p>The policy recognises the importance of licensed businesses to the local economy and the character of the area whilst trying to ensure that the activities do not cause nuisance or annoyance to the people in the area. This policy gives local people more control over what happens in their local area and involves them in shaping decisions for their local area. It promotes local decision-making and as such encourages empowerment.</p> <p>This policy guides the council when it considers applications for street trading consents. It informs applicants of the parameters in which the council will make decisions and how their needs will be addressed. It also highlights the council's undertaking to avoid duplication with other statutory provisions and its commitment to work in partnership with other enforcement agencies. The council aims to provide a clear, consistent service for users. At the same time, it aims to protect the safety of highway users, to prevent nuisance and to regulate the location and number of street traders.</p>
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<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>	Residents / Service Users	X	Partners	X	Stakeholders	X
	Staff		Age		Disability	
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other			
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	The responsibility for this policy sits within Environment and Enterprise.					

Stage 2: Evidence & Data Analysis

4. What evidence is available to assess the potential impact of your proposals? This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated for any Protected Characteristic), you may need to include this as an action to address in your Improvement Action Plan at Stage 6)

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	2011 Census Data Harrow Borough Profile Results from consultation	There is no data available to suggest that there would be a disproportionate adverse effect on this protected characteristic. Health and safety will always be paramount in any street trading activity. Regular inspections will be undertaken by the Council and conditions are attached to all licences granted. New traders will be subject to a six month probation period. There is no data available to demonstrate that visitors, stall holders, shops and businesses would be

										disproportionately adversely affected.
Disability (including carers of disabled people)	As above									There is no data available to suggest that there would be a disproportionate adverse effect on this protected characteristic.
Gender Reassignment	As above									As above
Marriage / Civil Partnership	As above									As above
Pregnancy and Maternity	As above									As above
Race	As above									As above
Religion and Belief	As above									As above
Sex / Gender	As above									As above
Sexual Orientation	As above									As above

Stage 3: Assessing Potential Disproportionate Impact

5. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.
- **NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 6

Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at **Stage 3**?

Who was consulted? What consultation methods were used?		What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? E.g. revising your proposals

Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

Protected Characteristic	Positive Impact	Adverse Impact		Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)
		Minor	Major		
	✓	✓	✓		

Age (including carers of young/older people)					
Disability (including carers of disabled people)					
Gender Reassignment					
Marriage and Civil Partnership					
Pregnancy and Maternity					
Race					
Religion or Belief					

Sex				
Sexual orientation				
8. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?				
If yes, which Protected Characteristics could be affected and what is the potential impact?				
9. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?	Yes			
	No			
If yes, what is the potential impact and how likely is it to happen?				

Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity
- Monitoring the impact of the proposals/changes once they have been implemented
- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
Monitoring the impact of this policy	<p>This policy will be reviewed within three years of its implementation. At the time of review consultation will take place with appropriate parties.</p> <p>The review will highlight successes as well as areas for improvement. Reviews will also seek to introduce where necessary any new powers granted to local authorities in managing street trading. The review will include measures such as:</p> <ul style="list-style-type: none"> • Number of applications received and considered • Footfall in markets being maintained or improved • Markets and stalls continuously improving (e.g. appearance, quality of goods on offer, ability to meet local need or particular demand • Reduction in levels of complaints <p>The policy may also be updated where there is a change of legislation or where national or regional guidance necessitates it. The public protection team will be responsible for monitoring this policy.</p>	<p>Timely Reviews</p> <p>Results of this monitoring will be regularly reviewed by service managers and any gaps identified addressed. Results of monitoring will be included in the service performance report.</p> <p>Requests will be recorded and analysed to identify trends.</p>	Public Protection Team	2018 (overall review)

Stage 7: Public Sector Equality Duty

<p>10. How do your proposals meet the Public Sector Equality Duty (PSED) which requires the Council to:</p> <ol style="list-style-type: none"> 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 2. Advance equality of opportunity between people from different groups 3. Foster good relations between people from different groups 	<p>Clear Street Trading Policy supported by robust monitoring arrangements The policy enables the council to:</p> <ul style="list-style-type: none"> • Take leadership in supporting and promoting economic activity in the Borough; • Demonstrate transparency and integrity when dealing on market stall matters; • Ensure that there is consistency when making decisions; providing equal chance of fair trade to all residents and businesses; • Deliver high quality services by responding to changing needs through constant evolution and innovation; and • Introduce operating efficiency in carrying out the council's duties.
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Stage 8: Recommendation

<p>11. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)</p>	
<p>Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed.</p>	<p>X</p>
<p>Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are listed in the Action Plan above.</p>	
<p>Outcome 3 – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities</p>	

to advance equality of opportunity. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. **(Explain this in Q12 below)**

12. If your EqIA is assessed as **outcome 3** explain your justification with full reasoning to continue with your proposals.

Stage 9 - Organisational sign Off

<p>13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>	<p>E&E Directorate Equalities Task Group</p>	<p>Signed: (Lead officer completing EqIA)</p>	<p>[Redacted]</p>	<p>Signed: (Chair of DETG)</p>	<p>[Redacted]</p>
<p>Date:</p>	<p>1 June 2015</p>	<p>Date:</p>	<p>1 June 2015</p>	<p>Date EqIA presented at the EqIA Quality Assurance Group (if required)</p>	<p>1 June 2015</p>
		<p>Signature of DETG Chair</p>	<p>[Redacted]</p>		