

Initial Equality Impact Assessment – Service Change.

Department	Environment and Community Services
Service	Environmental Health
People involved	Marie Whitbread, Aveen Kelly, Clare O'Connor

1. What are the aims of the service and what changes are being proposed?	
<p>Environmental Services (Food Safety, Licensing, Health and Safety, Trading Standards, and the Environment Team) and Private Sector Housing have historically performed to a high standard which is reflected in high levels of business compliance, business and customer satisfaction.</p> <p>However, over a number of years the national focus has shifted away from an extremely prescribed and process driven model and towards risk assessment, intelligence-led enforcement and targeting of resources. The proposals in Paper 13-629 reflect this change.</p>	
2. What is the rationale behind these changes?	
<p>Nationally there is a focus on risk assessment, intelligence-led enforcement and targeting of resources. In addition regulatory services are soon to be market tested or mutualised and as such any additional changes to reflect national focus should be implemented prior to any market testing or work beginning on a proposal for a mutual. Additionally, in light of the Council's budget outlook and the need to achieve savings, the Environment and Community Services Department continues to review its services in order to identify budget reductions.</p>	
3. What information do you have on the service and the potential impact of your service change in relation to the following?	
	List information you have.
Race	Business owners – BME 49%, White/European 51% (Data collected from customer surveys and inspections.) This is above the borough average according to the 2011 Census, which showed that 28.8% of the borough population are

	<p>BME residents. This highlights that the service interacts with above the borough average of BME residents (businesses) and therefore any changes will impact more on BME businesses than non-BME businesses</p> <p>Complainants - BME 13%, White/European 87% (Data collected from customer complaints). This is below the borough average according to the 2011 Census. This highlights that the proportion of complainants who are White residents is above the borough average and changes to the complaints policy are more likely to impact on White residents, Data collected for Food Safety: This shows that for April – August 2012 FSA funded coaching support was provided to 31 businesses of which 27 of the operators spoke English as a second language (87% of businesses supported). Of the businesses subject to significant intervention and enforcement in 12/13, 9 out of 10 were from the BME community. This highlights that the service supports and interacts with above the borough average of BME residents (businesses) and that changes to the service is most likely to impact on them.</p> <p>Ward data known for areas of high numbers of HMOs: The highest numbers of HMOS are in Tooting (263), Bedford (254) and Nightingale (181). The highest number of Notices served on all HMOs since July 2006 were in Tooting, Graveney and Bedford. The BME population for these wards is as follows: Tooting – 52.7% Bedford – 27.6% Nightingale – 21.4% Graveney – 46.4% This highlights that Private Sector Housing's work on HMOs impacts on areas with above the borough average percentage of BME residents.</p>
Gender	<p>Business Owners - 64% Male, 36% Female (Data collected from customer surveys and inspections.) This varies from the borough average which shows that 51.6% of the borough population are female.</p> <p>Complainants – 30% Male, 70% Female</p> <p>This highlights that the service interacts with below the borough average of female residents in its interaction with businesses but above the borough average of female residents in interaction with complainants.</p>

Disability	Business Owners - 2%. (Data collected from customer surveys and inspections.) Complainants – 5% (Data collected from customer complaints.)	
Age	Business Owners – 18-24 3%, 25-49 - 65%, 50-59 – 19%, 60-70 – 11%, Over 70 – 2% (Data collected from customer surveys and inspections.) Complainants - 18-24 1%, 25-49 - 56%, 50-59 – 19%, 60-70 – 13%, Over 70 – 11% (Data collected from customer complaints.) 24 % of complainants are over 60 years of age. They are more likely not to have access to computers and therefore less able to access information on line, but the option to report a complaint over the phone remains.	
Faith	Data not collected	
Sexual Orientation	Data not collected	
4. Thinking about each group below please list the impact that the service change will have		
	<u>Positive</u> impacts	Possible <u>negative</u> impacts
Race	Resources will be focussed on those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents	<u>Food Safety</u> – email or telephone complainant and send guidance notes instead of visiting low risk complaints, delivering more training on line and reducing advice to new businesses could impact more on BME owned businesses as they comprise the majority of businesses currently interacted with. The fact that the majority have English as a second language could mean that more end up as higher risk as they have not been able to follow the guidance. To mitigate against this clear and plain English will continue to be used in all correspondence. FSA leaflets, which are available in multiple languages, will be used and signposted to. http://www.food.gov.uk/about-us/publications/pubsother/ Private Sector Housing – Moving quicker to enforcement, targeting high risk

		<p>properties and extending the scope of the HMO licensing regime may impact more on BME residents (if they are owners of HMOs) as two areas of high volumes of HMOS/HMO notices have above the borough average of BME residents. However, the move to quicker enforcement will also positively impact on BME residents if they are living in properties that do not meet the required standards as these should be improved at a quicker rate.</p> <p><u>Trading Standards</u> - If business advice on age restricted sales is reduced and a test purchase and enforcement regime is adopted, it will have an adverse impact on BME businesses as 49% of businesses in the borough are owned by BME owners and the number of prosecutions against BME businesses will inevitably rise disproportionately. To mitigate against this, intelligence led Test Purchasing will be carried out, which will allow issues to be identified early on.</p> <p>Sunday markets attract BME families so any reduction in enforcement may result in an increase in counterfeit and unsafe goods being sold which may disadvantage BME families.</p> <p>To mitigate against this, some specialist language support for businesses will be provided and issues surrounding counterfeiting and unsafe goods will be signposted to National Trading Standards Site.</p> <p>Overall – the changes proposed may impact on the borough population as a whole of which 28.6% are BME, however the driver for the changes is to address those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents.</p>
Gender	As above	<p>Overall – the changes proposed may impact on the borough population as a whole of which 51.6% are female, however the driver for the changes is to address those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents.</p>

Disability	As above	Overall – the changes proposed may impact on the borough population as a whole of which 2.9% are disabled or long term sick, however the driver for the changes is to address those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents.
Age	As above	<p>The changes proposed regarding complaints may impact more on the elderly especially with regard to food, Trading Standards, nuisance, pest control and housing, because elderly people are more likely to ignore use by dates, therefore keep food longer and are more likely to get food poisoning. In addition they often live in poor housing and are more likely to be targeted by rogue traders.</p> <p>To mitigate against this, the services will use the most appropriate media and signpost residents to the Citizen's Advice Bureau and other advice services.</p> <p>Overall – the changes proposed may impact on the borough population as a whole of which 8.8% are aged 65 or above although 24% of complainants and 13% of business users of the service are over 60. However the driver for the changes is to address those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents,</p>
Faith and sexual orientation	As above	Overall – the changes proposed may impact on the borough population as a whole, however the driver for the changes is to address those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents,
5. Is a full EIA required? No.		
<ul style="list-style-type: none"> • Is the service a frontline service? Yes • Is it clear what impact the service change will have on all the equality groups? Yes • Overall will the change have a negative impact on any of the equality groups? It may impact more on BME businesses, 		

however mitigating actions have been identified.
Comments - Please give the rationale here for not undertaking a full EIA
Mitigating actions have been identified. The changes will ensure that resources will be focussed on those issues which are the highest risk, cause the most harm, and give the greatest concern to Wandsworth residents.
6. Through the initial EIA have you identified any actions that needed to be implemented to improve access to the service or monitoring of the service? (please list)
<p>Clear and plain English will continue to be used in all correspondence. FSA leaflets, which are available in multiple languages, will be used and signposted to.</p> <p>http://www.food.gov.uk/about-us/publications/pubsother/</p> <p>In addition some specialist language support for businesses will be provided.</p> <p>Intelligence led Test Purchasing will be carried out.</p> <p>Issues surrounding counterfeiting and unsafe goods will be signposted to National Trading Standards Site.</p> <p>Services will use the most appropriate media and signpost residents to the Citizen's Advice Bureau and other advice services where appropriate.</p>

Signed

Date;

Approved by: Clare O'Connor