



Equality Impact Analysis

Title of policy, function or service	Community Protection Compliance Policy 2021-2026
Lead officer	Jamie Mackenzie
Person completing the EIA	Jamie Mackenzie
Type of policy, function or service:	Existing (reviewed) <input checked="" type="checkbox"/> X New/Proposed <input type="checkbox"/>
Version & Date	Version 1.0 08 June 2021

1. Background

Watford Borough Council (the council) is the regulatory authority for environmental purposes health and licensing matters. As a regulator, the council is required to publish a policy on how it will approach regulation of businesses.

In 2011 the council developed an Environmental Health and Licensing Compliance Policy to ensure that decisions and processes related to compliance were clearly explained for all residents, visitors and businesses. This policy (the Policy), now named the Community Protection Compliance Policy 2021-2026, ensures that decisions are fair and consistent, and that the right standards are applied to ensure we achieve the highest levels of compliance with national and local regulations.

The Policy is regularly reviewed and the current policy is now due for review. Prior to any changes to the existing policy taking effect, a public consultation is carried out.

2. Focus of the Equality Impact Analysis

This Equality Impact Assessment has been created to ensure that the public consultation on this proposed changes is fair, transparent and does not discriminate against any person or group.

3. Engagement and consultation

A full public consultation on the draft policy is planned between 12 July 2021 and 23 August 2021

This will include:

- placing the information about the consultation, and the various methods of responding to the consultation, on the Watford Borough Council website
- notification through the council Communications team to various publication including the local newspaper
- directly notifying a number of local and national organisations and authorities, including business forums and membership organisations, licensing authorities, national charities, disability advocacy groups and trade publications
- an audio reading of the proposed policy and consultation documents to be made available through collaboration with the Watford Talking Newspaper
- creating an online questionnaire to allow for ease of response to the consultation for

some respondents

4. What we know about Watford

Watford has a quite significantly younger population than Hertfordshire as a whole.

Those who report ill health and who are limited in mobility is marginally lower than the UK average

In context, the 2011 census reports that 5500 people reported day to day activities being limited a lot by health and disability issues. Almost 7000 residents reported day to day activities being limited a bit. It seems reasonable that 2021 figures could be somewhere around 6,500 - 7000.

5. How will the council ensure equality is promoted during the consultation period?

Watford Borough Council is committed to championing equality and embracing diversity across the full range of our services, whether we deliver the service ourselves or through partnership, and in our role as an employer.

To assist in gathering responses from people with a broad range of protected characteristics officers of the Community Protection service will actively seek to notify and engage as many residents, businesses and groups as possible.

There are a number of people with protected characteristics who could be impacted by the proposed policy and it is essential that all views are represented in the final policy presented to Licensing Committee in September 2021.

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Corporate Plan:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

- By ensuring this consultation is comprehensive the council is ensuring that opportunities for all those with protected characteristics are advanced in terms of influencing the development of a policy that directly impacts a person's ability to access a business, run a business, use local services and enjoy a high quality of life as a resident or visitor to the Borough.
- We know that many people who run their own business do so as sole-traders or with very small teams and that access to resources to assist in compliance may be difficult to come by or to understand. Against this, the council must balance the need to ensure public safety and access to a fair and equitable environment for all. This will mean taking enforcement action against businesses that are non-compliant and those which, following advice, persist in being non-compliant.
- We know that many people who access services in Watford, rent homes, visit food premises, buy goods or services and use transport systems such as hackney carriages and private hire vehicle services have a range of needs and that these customers must be protected from illegal practice, anti-social behaviour and other activities that are detrimental to quality of life and/or harmful to health.
- Through consultation on this policy we can make sure that the policy is fair and that any additional safeguards against dangerous practice can be added prior to consideration by the Licensing Committee. This will support business by setting clear guidelines, and by helping to promote the high standards on offer in Watford. This should have a positive impact on all those with protected characteristics and particularly those with additional vulnerabilities.
- The borough's existing business owners and residents can be confident that they are fully engaged in decisions that impact them directly. They can make suggestions for changes to the proposed policy before adoption. This will have a positive impact on the reputation of the town and help enhance good community relations.

B. Negative impacts

There should be no negative impact to ensuring a comprehensive consultation is conducted.

A separate equality impact analysis will be completed following the consultation and prior to the policy appearing before the Licensing Committee and any decision on adoption being made.

6. Overall conclusion

Overall we can be confident that the consultation period is sufficient to ensure that responses can be received from all stakeholders and interested parties, including those who may need longer to read, process and respond to the information.

All responses will be considered and the information used to inform the final policy to be considered by the Licensing Committee.

Summary of potential positive and negative impacts on protected characteristics

Protected Characteristic	Positive	Negative	None	Reasons for decision
Age	X			The length of time of the consultation and the work to ensure ease of access to submitting a response will ensure that those who may need longer to respond, or who may not have access to technology in order to respond quickly by electronic means will have the chance to give their views. We will contact charities representing the views of older people directly.
Disability	X			We will contact a number of local and national charities to seek feedback on the proposed policy.
Ethnicity	X	X		Depending on business sector, the impact on ethnicity could be both positive and negative. As many taxi and private hire drivers come from an ethnic minority background elements of the policy may disproportionately impact upon them. We will engage will trade leaders, associations, media and by way of online surveys in order to gather the views of the trade as comprehensively as possible. Changes to the way that licence suspensions are dealt with for taxi and private hire licence holders could add additional restrictions to current and future licence holders although it should be noted that these restrictions will only be relevant in the case of offences being committed by licence holders.
Sex			X	There is no specific positive or negative impact on sex discrimination as all responses will be given equal weight.
Sexual orientation			X	There is no specific positive or negative impact on sexual orientation as all

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Protected Characteristic	Positive	Negative	None	Reasons for decision
				responses will be given equal weight.
Religion			X	There is no specific positive or negative impact on religion as all responses will be given equal weight.
Pregnancy/maternity			X	There is no specific positive or negative impact on pregnancy/maternity as all responses will be given equal weight.
Gender orientation			X	There is no specific positive or negative impact on gender orientation as all responses will be given equal weight.

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
General increase in compliance with regulations Increased business for local service providers through improved reputation and ability to build a compliant business Better access to local goods and services Reduced instances of anti-social behaviour in the Borough	All All All All	Ensure policy consultation has good promotion and an easy way to feedback on concerns.

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
Perception that regulation in Watford is heavy handed	All	Ensure consultation is promoted in a way that explains the clear reasons for the policy

This EIA has been approved by:

Justine Hoy, Head of Community Protection Date 28/6/2021