



City of Westminster

EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

- The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

<https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx>

An EIA e-learning module is available for all Westminster staff:

www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by **2 September 2016**.

Title
7.7 Registration Service Income Growth – Commercialisation
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? • In what context will it operate? • Who is it intended to benefit? • What results are intended? • Why is it needed?
<p><i>A member of the public should have a good grasp of the proposal after reading this section.</i></p> <p>The Registration Service is planning to move from a budget deficit position to a full cost recovery operational model, and potentially to look at further commercial income generating opportunities. This will include basing non statutory / discretionary fees and charges on the actual cost of the provision of the whole registration service, not individual component parts; and looking at commercial opportunities such as advertising on the service microsite. It will ensure the service is cost neutral and is therefore not funded by other Council revenue and grants, reducing the burden on the council's finances at time when the Council is facing increasing financial pressures.</p>
Details of the lead person completing the screening/EIA
<p>(i) Full Name: Christie Junor-Sheppard</p> <p>(ii) Position: Head of Registration Services</p> <p>(iii) Unit: Registration and Nationality Services</p> <p>(iii) Contact Details: 020 7641 1790 / cjsheppard@westminster.gov.uk</p>
Date sent to Equalities@westminster.gov.uk
Version number and date of update
<p>Version 1</p> <p><i>You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process.</i></p>

SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1	Does the project, policy or proposal have the potential to disproportionately impact on any of the following groups? If so, is the impact positive or negative?																																																		
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1.3	Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal
	Yes <input type="checkbox"/> No <input type="checkbox"/>
1.4	How have you come to this decision?

EQUALITY IMPACT ASSESSMENT

SECTION 2: BUILDING AN EVIDENCE BASE

2.1	Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal <ul style="list-style-type: none"> <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> <i>A baseline of data is available here</i> 	
	How many people use the service currently? What is this as a % of Westminster's population?	Over 25,000 people use Registration services in Westminster, which includes non- residents
	Age	A high proportion of our users are between 25 and 40, due to the nature of services provided (eg. Births and ceremonies)
	Disability	
	Gender	A higher proportion of our users are women due to the nature of services provided (eg births)
	Race	Over 180 different countries are represented in our Nationality services and Citizenship ceremonies, the highest proportion being USA (6%); India (4%);

		Australia (4%).
	Religion or belief	
	Sexual orientation	
2.2	Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.</i>	
	<p>By the very nature of the service, pregnant women / women are disproportionately represented in the birth registration service.</p> <p>By the very nature of the service, non-British nationalities are disproportionately represented in the Nationality and Citizenship services, though no one nationality or region of nationalities dominates the figures.</p>	
2.3	Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i>	
	<p>No, though income may be a barrier for some groups using Westminster ceremony services. However a wide range of options are and will continue to be, offered including ceremonies in the statutory register office for a minimum fee.</p>	

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

3.1	Consultation Information <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i>
	<p><i>It is helpful to identify whether you have conducted any consultations for your proposal, in some cases a statutory consultation is required. If your proposal has not required a consultation, please highlight this here. Consultations will help you identify what the potential impact of your proposal might be.</i></p> <p>No external consultation has taken place yet, though informal consultation has taken place with stakeholders and providers such as GRO; Portland Hospital and staff. In addition the service conducts annual benchmarking of fees and charges against neighbouring local authorities, to assess what “market fees” are being charged, and how Westminster compares.</p>
3.2	What might the potential impact on individuals or groups be? <i>Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups</i>
	<p><i>Using the evidence gathered in section 2 and any consultation activity highlighted in 3.1; explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered in order to properly consider the impact. Please state when no impact has been identified.</i></p> <p>These proposals may result in people on low incomes not being able to afford to use our services, and having to use other local authorities’ services. This may disproportionately affect Pregnant women / women / non British nationalities</p>

SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an impact, what can be done to reduce or mitigate the impact? (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).											
	<p>Consider what actions can be put in place to remove or reduce your identified impact(s). Record all potential actions to show you have considered all options. Please note if no mitigating actions have been identified.</p> <table border="1" data-bbox="245 689 1517 1529"> <thead> <tr> <th data-bbox="245 689 732 835">Column A – Issues or barriers, things to take into account</th><th data-bbox="732 689 1517 835">Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).</th></tr> </thead> <tbody> <tr> <td data-bbox="245 835 732 1346">Increasing fees and charges may mean customers on low incomes cannot afford to use Westminster Registration Services</td><td data-bbox="732 835 1517 1346"> <p>The service could offer a resident discount such as 20% across key services such as Nationality Checking and ceremonies</p> <p>The service could offer discounted days for residents for example at the newly refurbished Old Marylebone Town Hall</p> <p>The service would continue to offer a choice in services so for example customers could continue to choose to go to our offices to register a birth, rather than register at bedside at Portland Hospital.</p> <p>Customers would also still have the choice to go to other local authorities for services including ceremonies and nationality services, as they do now.</p> </td></tr> <tr> <td data-bbox="245 1346 732 1435"></td><td data-bbox="732 1346 1517 1435"></td></tr> <tr> <td data-bbox="245 1435 732 1529"><i>Enter additional rows if require</i></td><td data-bbox="732 1435 1517 1529"></td></tr> </tbody> </table>			Column A – Issues or barriers, things to take into account	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).	Increasing fees and charges may mean customers on low incomes cannot afford to use Westminster Registration Services	<p>The service could offer a resident discount such as 20% across key services such as Nationality Checking and ceremonies</p> <p>The service could offer discounted days for residents for example at the newly refurbished Old Marylebone Town Hall</p> <p>The service would continue to offer a choice in services so for example customers could continue to choose to go to our offices to register a birth, rather than register at bedside at Portland Hospital.</p> <p>Customers would also still have the choice to go to other local authorities for services including ceremonies and nationality services, as they do now.</p>			<i>Enter additional rows if require</i>		
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4.2	Now that you have considered the potential or actual effect on equality, what action are you taking?											
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	<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.
4.3 Please document the reasons for your decision			
	Offering discounted services or days will mitigate the effect of the increase for people on low income, and encourage usage by local residents. The service will continue to maintain the range of choice across venues and services, allowing customers to select the location, day or time of their service that best meets their needs.		

SECTION 5: ACTION PLAN

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

5.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. <i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Agree fee structure which reflects resident discount / discounted days	People on low income	Reduce the impact of increased fees and charges		Christie Junor-Sheppard, Head of Registration Services 020 7641 1790 cjsheppard@westminster.gov.uk	01/01/2017	
	Enter additional rows if required						

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE: Mike Clarke, Director of Libraries & Culture

FULL NAME:

UNIT: Registration Service

EMAIL & TELEPHONE EXT: mclarke1@westminster.gov.uk

DATE (DD/MM/YYYY): 22/09/2016.

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by 2 September 2016.

All completed EIAs should be sent to: Equalities@westminster.gov.uk