



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 14th March 2018.

Title
5.14 Review of Highways Services including Road Management
<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>This EIA covers an end to end review of the City Highways service with a focus on the Road Management service considering its efficiency and effectiveness and the implementation of a new model for service delivery.</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? The purpose of this proposal is to ensure that the City Management and Communities Directorate is operating efficiently and effectively, providing a good customer service and meeting medium term savings targets. • In what context will it operate? This Business Case will consider a series of options for reducing the costs associated with the delivery of services across the public realm whilst minimising the potential impact on the levels and quality of service. The proposal will have its own action plan, delivery lead and implementation process. • What results are intended? The intended results of the proposals are: <ul style="list-style-type: none"> • To achieve a medium term saving in revenue funding of £750k in 2017/18 • To minimise impact on service levels • To deliver where possible an improved customer service and minimise the impact on Westminster's Businesses, Residents and Visitors • Why is it needed? Central Governments reduction in funding will result in a significant drop in available funding for Local Authorities. As a consequence, revenue savings needs to be found across the Highways and Public Realm service within City Management and Communities for 2017/18 in order to help close this funding gap. Failure to achieve sufficient savings will lead to further structural problems within Westminster's overall budget. • Who is it intended to benefit and how? The intended benefits will cover all of Westminster's Residents, Visitors, Businesses and Employees. • Who, potentially, could this project, policy or proposal have a detrimental effect on, and how?

This proposal will impact existing staff in order to meet savings levels. A full staff and Trade Union consultation has been undertaken and relevant approvals will need to be agreed with cabinet members prior to any implementation.

This will result in some potential redundancies but the actual number is not as yet known. This will be reviewed as we go through the VR, assimilation and appointment process.

Attempts will be made to redeploy any displaced staff in line with Council policies.

Details of the lead person completing the screening/EIA

(i) Full Name: Kevin Goad

(ii) Position: Director City Highways

(iii) Unit: City Highways

(iii) Contact Details: 0207 641 1903

Date sent to Equalities@westminster.gov.uk

14/03/2018

Version number and date of update

V3.0 March 2018

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?				
	None	Positive	Negative	Not sure
Disabled people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Particular ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Men or women (include impacts due to pregnancy/ maternity)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People or particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in particular age groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groups with particular faiths and beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If the answer is “negative” or “unclear” consider doing a full EIA				
1.2 What do you think that the overall NEGATIVE impact on groups and communities will be?				
None/ Minimal		Significant		
<input checked="" type="checkbox"/>		<input type="checkbox"/>		
None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups.		Significant impact would be where there is an impact is identified that has substantial impact on any groups.		
If the answer is “significant” consider doing a full EIA				

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 checked="" type="checkbox"/> No <input type="checkbox"/>
1.4	How have you come to this decision?
	<p>This is an internal reorganisation where many of the posts affected are a rationalisation of posts that have traditionally operated in silos and duplication was identified through workshops and staff engagement. It is therefore unlikely to have an impact of service users but will impact on staff in the following ways;</p> <ul style="list-style-type: none"> • Change in job descriptions • Change in ways of working • Potential redundancies

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> 	
	As this is an internal reorganisation It is therefore unlikely to have an impact of service users but will impact on staff as outlined in 1.4 above.	
	How many people use the service currently? What is this as a % of Westminster's population?	A million visitors each day to Westminster will all interact at some point with the services linked to the proposals. This is 4.4 times the resident population
	Age	Staff Affected <ul style="list-style-type: none"> • The highest frequency of impacted staff is in the 30 – 44 age bracket (35 people) • The second highest frequency of impacted staff is in the 45 – 59 age bracket
	Disability	Staff Affected <ul style="list-style-type: none"> • Not disabled 21 people • Not recorded 56 people • Prefer not to say 1 person

Gender	Staff Affected <ul style="list-style-type: none"> • 33.33% reported as female • 66.67% reported as male
Race	Staff Affected <ul style="list-style-type: none"> • B5 – 2 white • B4 – 18 white, 3 BME • B3 – 25 white, 7 BME • B2 – 2 BME • B1 – 3 white, 4 BME
Religion or belief	None available
Sexual orientation	None available

2.2 Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? *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.*

If yes, provide details.

The structure contains 96 posts but the number of staff affected is 76, therefore, the sample size is very small

An analysis of the staff affected shows that it is consistent with the make-up of the CMC workforce. CMC has the highest frequency of male staff c60.7% and the lowest frequency of female staff c39.8% compared across the other directorates.

Looking at pay difference between gender and across the band 1 to band 5 grades; there is no difference in pay levels at the Band 1 and band 4 grades, females are paid higher at the Band 2 grade and males paid 3% higher than females at the Band 3 grade. There are no females at the Band 5 grade.

Looking at the pay difference across ethnicity, differences can only be found at the Band 3 and 4 grades with a 7% difference in favour of white staff over BME at the Band 3 grade and 2% difference at the Band 4 grade.

In terms of the impact of the proposal by Band; there are 21 Band 4 and 38 Band 3 staff impacted out of a total of 76 staff and accounting for over 75% of the staff.

2.3 Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? *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.*

If yes, provide details.

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	<p>Consultation Information <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i></p>
	<p>Formal staff consultation began on 22 January 2018. Staff and trade unions were briefed on the proposals which were issued to all affected staff in electronic and hard copy. The initial length of the consultation period was 30 days, an additional 15 days were added to this period by mutual agreement between management and unions to allow additional time for feedback. Staff were invited to comment and feedback on the proposed changes and responses to general questions were updated weekly and made available to all staff through the FAQ documents published on the programme's staff site. As well as the FAQ documents, team briefings and bulletins have been used to provide updates and key information.</p> <p>Throughout the 45-day consultation period over 100 queries were logged by the programme from a total of 76 members of staff in scope for the changes. This level of engagement can be attributed to early and regular interaction with staff through varied communication channels for a significant period of time prior to staff being formally consulted on the proposals. The main channels of face to face engagement during consultation were HR surgeries, workshops and one to one meetings with a member of the senior management teams, as appropriate.</p> <p>HR surgeries and one to one meetings with senior managers, as appropriate, were held throughout the consultation period. The aims of these sessions were to provide an opportunity for staff to meet with their People Services lead and to clarify any queries on the process and answer specific questions on individual's particular circumstances. Separate pensions sessions were held for members of staff who wished to discuss their pension.</p>
3.2	<p>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>
	<p>The consultation report outlines how the proposal impacts on staff which details the potential deletion of posts and creation of a new proposed structure to which individuals may be assimilated or put through a competitive process in line with the Councils policy.</p> <p>Looking at the composition of staff in the most impacted Bands (3 and 4), men are likely to be more impacted than women.</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>A matching exercise was completed for all new roles in the proposed structure against existing roles and all staff have either been assimilated, placed in a competitive assimilation or ringfence process.</p> <p>This has been achieved by following a principle of Band match where staff have been matched against core competencies with the understanding that they can be trained on technical requirements (if there is a knowledge and/or a skill gap).</p> <p>The recruitment for the new structure is also being scheduled in parallel with recruitment in PPL which is also undergoing a change.</p> <table border="1" data-bbox="264 920 1532 1160"> <thead> <tr> <th data-bbox="264 920 746 1066">Column A – Issues or barriers, things to take into account</th> <th data-bbox="751 920 1532 1066">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="264 1066 746 1160"></td> <td data-bbox="751 1066 1532 1160"></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).										
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).													
4.2	Now that you have considered the potential or actual effect on equality, what action are you taking?													
	<table border="1" data-bbox="264 1368 1532 1805"> <tbody> <tr> <td data-bbox="264 1368 368 1525"><input checked="" type="checkbox"/></td> <td data-bbox="373 1368 715 1525">1. No major change (no impacts identified)</td> <td data-bbox="719 1368 1532 1525">Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.</td> </tr> <tr> <td data-bbox="264 1525 368 1608"><input type="checkbox"/></td> <td data-bbox="373 1525 715 1608">2. Adjust the policy</td> <td data-bbox="719 1525 1532 1608">You will take steps to remove barriers or to better advance equality.</td> </tr> <tr> <td data-bbox="264 1608 368 1727"><input type="checkbox"/></td> <td data-bbox="373 1608 715 1727">3. Continue the policy (impacts identified)</td> <td data-bbox="719 1608 1532 1727">You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.</td> </tr> <tr> <td data-bbox="264 1727 368 1805"><input type="checkbox"/></td> <td data-bbox="373 1727 715 1805">4. Stop and remove the policy</td> <td data-bbox="719 1727 1532 1805">There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.</td> </tr> </tbody> </table>		<input checked="" type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.	<input type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.	<input type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	<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.
<input checked="" type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.												
<input type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.												
<input type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.												
<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													
	All impacts identified during the consultation have been considered.													

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
Consultation with affected staff	all	Ensure staff understand the proposals, have the ability to raise any issues and have an opportunity to input to the proposals before final decisions are taken. Better inform management of any mitigating measures that need to be considered	Managers HR	Kevin Goad Director City Highways	End March 2018	green
<i>Enter additional rows if required</i>						

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE: Kevin Goad

FULL NAME: Kevin Goad

UNIT: Highways and Public Realm

EMAIL & TELEPHONE EXT: kgoad@westminster.gov.uk 1903

DATE (DD/MM/YYYY): 14/03/2018

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