



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:

<http://rewire/supportunits/policyplaningandperformance/Pages/Equalities.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 David O'Leary (Strategy Unit): <mailto:mdoleary@westminster.gov.uk>

SEB will monitor compliance with the requirement to complete EIAs.

SECTION 1: DETAILS OF EQUALITY ANALYSIS

1.1	Title of EIA
	Westminster City Council 2023 Cumulative Impact Assessment
1.2	What are you analysing? <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>The Council may undertake a Cumulative Impact Assessment (CIA) to determine whether any area within its boundary is under cumulative stress. If the Council wishes to have cumulative impact zones, it must publish a CIA, which must be reviewed every three years. The Assessment remains relevant until replaced by a subsequent CIA.</p> <p>A CIA is conducted to evaluate the potential impact of licensed premises on a given area and is a data driven document. This assessment considers the Act's four licensing objectives: prevention of crime and disorder, public safety, prevention of public nuisance, and the protection of children from harm. It scrutinises whether clusters of licensed premises in an area lead to a cumulative impact on these objectives due to their proximity.</p> <p>The purpose of reviewing a CIA is to determine whether the opinion that the licensing objectives are being undermined remains the same, which in these circumstances it does. The CIA does not impact on existing policies in the Statement of Licensing Policy.</p> <p>Procedurally, the Council is required to carry out a statutory consultation on the draft proposed CIA before it can be published. Officers are obliged to review the responses and any amendments are taken into account in light of the feedback given.</p> <p>The consultation was undertaken from 9th October to 12th November 2023 and feedback from those responding to the consultation has been incorporated into the CIA. No equalities issues were raised as part of the consultation.</p>
1.3	Details of the lead person completing the EIA
	<p>(i) Full Name: Aaron Hardy</p> <p>(ii) Position: Principal Policy Officer</p> <p>(iii) Unit: Innovation and Change</p> <p>(iii) Contact Details: ahardy1@westminster.gov.uk</p>
1.5	Version number and date of update
	V1 21/11/2023

SECTION 2: EQUALITY ANALYSIS

2.1	<p>If you are planning changes to a current service, which customers from the protected groups are using the service currently?</p> <ul style="list-style-type: none"> • 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
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	evidence. Do not leave any box blank.
	There are no planned changes to a service.
2.2	<p>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>
	<p>Westminster’s revised Cumulative Impact Assessment is not anticipated to have a significant impact on any specific group as it is a collection and analysis of data.</p> <p>It is also important to highlight that this policy statement sits within the wider context of the Local Authority’s duties under the Equality Act 2010. These require us to have due regard to:</p> <ul style="list-style-type: none"> • Eliminating unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act • Advancing equality of opportunity between people who share a protected characteristic and people who do not share it • Fostering good relations between people who share a protected characteristic and people who do not share it <p>Having due regard involves the Council:</p> <ul style="list-style-type: none"> • Removing or minimising disadvantages suffered by people due to their protected characteristics • Taking steps to meet the needs of people from protected groups where these are different from the needs of other people • Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low. <p>We recognise that equality and diversity is not a parallel process or something to think about once a year. It is an absolutely fundamental part of improving services for everyone. It is nothing to do with ticking boxes or bureaucracy, and everything to do with making Westminster a place where anyone can be happy to live or work. It is central to delivering high quality customer services in the heart of London. We identify and actively address inequality, where evidence shows that it exists.</p> <p>This diversity and the changing nature of Westminster’s population makes Westminster a culturally and socially rich city, which benefits from the different experiences, perspectives and respect for others this diversity brings.</p>
2.3	<p>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>
	It is not believed that any groups are underrepresented in the monitoring information, relative to the size of their population.

<p>2.4</p>	<p>What other evidence can you use to assess impact? For example:</p> <ul style="list-style-type: none"> • Results of consultation or engagement activity • Analysis of enquiries or complaints • Benchmarking monitoring information with other local authorities • National research <p><i>If you do not have enough evidence you may need to take steps to fill in your information gaps – for example meeting with stakeholders, conducting surveys etc (the amount of evidence you need should be proportionate to what it is you are assessing. For example, changes to the eligibility for social care required a substantial consultation, as well as assessment of the numbers of people affected. However, a change to the frequency of bin collections will require less evidence to effectively assess impact).</i></p>
	<p>To assess the impact of the Cumulative Impact Assessment and ensure all voices are heard in its development, we have carried out a public consultation on the draft. No equalities issues were raised.</p>
<p>2.5</p>	<p>Will people from all equality groups be able to access the council service in question? Think about the customer journey and whether any barriers may exist for different groups along the way (from finding out about the service, at the access points, when receiving the service etc). <i>Separate guidance on identifying barriers is available on the WIRE.</i></p>
	<p>The CIA is not a service and will not result in any changes to a service.</p>
<p>2.6</p>	<p>What negative impacts or disadvantage could stem from the changes you are proposing on people from the different groups? Could any part of the policy discriminate unlawfully (this includes direct & indirect discrimination, victimisation and harassment)? <i>If there is any discrimination the action must stop immediately and advice sought.</i></p>
	<p>The CIA does not propose any changes to policy. Changes to policy will be subject to a separate consultation and EqlA.</p>
<p>2.7</p>	<p>Is there anything you can do to promote equality of opportunity? This means the need to:</p> <ul style="list-style-type: none"> • Remove or minimise disadvantages suffered by equality groups • Take steps to meet the needs of equality groups • Encourage equality groups to participate in public life or any other activity where participation is disproportionately low • Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary <p>Is there anything you can do to foster good relations between people who share a protected characteristic and those who do not? This means:</p> <ul style="list-style-type: none"> • Tackle prejudice • Promote understanding
	<p>The CIA aims to promote equality of opportunity and inclusion in line with Local Authorities' responsibilities under the Equalities Act and the Licensing Authority's Equalities Duties.</p>
<p>2.8</p>	<p>Are there changes proposed in related policy areas or services? How are you taking into account the combined impact of these changes? <i>Small changes in a</i></p>

policy area may cause some disadvantage, but the cumulative effect of changes in related areas could have a significant impact. A separate EIA will need to be undertaken where a number of changes are planned in a service area or where multiple changes are planned in different service areas that could impact on an equality group (for example changes in adult services, children's service, and transport/public realm changes could lead to a significant impact on disabled people, which may not be identified by looking at the changes individually)

There are no proposed changes to policy areas or services.

2.9 Considering your answers above, what are the issues, barriers, impacts you have identified and what can you do to reduce any negative impacts? Also include any issues you will need to take into account as your policy develops.

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).
The gathering of evidence on equalities and licensing	The Council participates in national and regional networks to share information and best practice. The Council will also monitor compliance and complaints, collect data locally and analyse and interpret this as necessary to improve understanding of the links between equalities and licensing.
Dissemination of information	A public consultation has been undertaken and there will be an associated comms plan alongside the launch of the revision.

2.10 Now you have considered the potential or actual effect on equality, what action are you taking now? Document the reasons for your decision.

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.
2. Adjust the policy	You will take steps to remove barriers or to better advance equality.
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.
4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.

1. No major change (no impacts identified) – given that the CIA is a data gathering and analysis exercise.

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:



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DATE (DD/MM/YYYY):21/11/23.....

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WHAT NEXT?