

Equality Impact Assessment Guidance can be found here; [Viewing Document: Equality Impact Assessment Guidance \(iow.gov.uk\)](#) or, via SharePoint.

Stage 1 Equality Impact Assessment – Initial Screening

Assessor(s) Name(s):	Alan Barnes
Directorate/School name:	Neighbourhoods
Date of Completion:	16 August 2021

Name of Policy/Strategy/Service/Function Proposal

Civil Penalties Policy

The Aims, Objectives and Expected Outcomes:

To provide an alternative sanction to certain housing related offences other than prosecution.
It will provide a lighter touch approach to enforcement, reduce resource implications, produce a suitable financial penalty for non-complaint landlords, enable income to be recycled within the service area.

Please delete as appropriate:

- This is a new policy proposal
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Key Questions to Consider in Assessing Potential Impact	
Will the policy /strategy/service/council/school function proposal have a negative impact on any of the protected characteristics or other reasons that are relevant issues for the local community and/or staff?	No
Has previous consultation identified this issue as important or highlighted negative impact and/or we have created a “legitimate expectation” for consultation to take place? A legitimate expectation may be created when we have consulted on similar issues in the past or if we have ever given an indication that we would consult in such situations	No
Do different groups of people within the local community have different needs or experiences in the area this issue relates to?	No
Could the aims of these proposals be in conflict with the council’s/school’s general duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not?	No
Will the proposal have a significant effect on how services, council or schools function/s is/are delivered?	No
Will the proposal have a significant effect on how other organisations operate?	No
Does the proposal involve a significant commitment of resources?	No
Does the proposal relate to an area where there are known inequalities?	No
<p>If you answer Yes to any of these questions, it will be necessary for you to proceed to a full Equality Impact Assessment after you have completed the rest of this initial screening form.</p> <p>If you answer No to all of these questions, please provide appropriate evidence using the table below and complete the evidence considerations box and obtain sign off from your Head of Service/Headteacher.</p>	

Protected Characteristics	Positive	Negative	No impact	Reasons
Age			X	This policy will apply equally to all landlords
Disability			X	This policy will apply equally to all landlords, and any access to service difficulties will be addressed and catered for during the enforcement process.
Gender Reassignment			X	This policy will apply equally to all landlords
Marriage & Civil Partnership			X	This policy will apply equally to all landlords
Pregnancy & Maternity			X	This policy will apply equally to all landlords
Race			X	This policy will apply equally to all landlords
Religion / Belief			X	This policy will apply equally to all landlords
Sex (male / female)			X	This policy will apply equally to all landlords
Sexual Orientation			x	This policy will apply equally to all landlords

Are there aspects of the proposal that contribute to or improve the opportunity for equality?	Yes/No
<p><i>If answered Yes, describe what these are and how they may be promoted or enhanced</i></p> <p>Due to the fact that this policy allows for any disabilities to be taken into consideration during the enforcement process it will contribute to the opportunity for equality.</p>	

Evidence Considered During Screening
Housing Renewal enforcement procedures including the pre formal enforcement human rights and diversity check

Head of Service/Headteacher sign off & date:	
Legal sign off & date:	

A signed version is to be kept by your team and also an electronic version can be published on the council's / school's website (follow the link from the EIA page on the intranet) unless it relates to staffing/specific individuals. In which case, it should only be kept by your team.

Stage 2 Full Equality Impact Assessment

Assessor(s)Name(s):	
Directorate/School name:	
Date of Completion:	

Name of Policy/Strategy/Service/Function Proposal

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The Aims, Objectives and Expected Outcomes:

Using the information provided in your initial screening, write a brief description of your policy, strategy, service, council or school function under assessment. It is important to focus on the reasons for a new or changed approach and what it intends to achieve. Include who the main beneficiaries or users are and the main groups of people with protected characteristics who are affected. State how this proposal fits with the council's corporate priorities/school's priorities.

Please delete as appropriate:

- This is a new policy/strategy/service/council/school function proposal
- This is a proposed change/review to/removal of an existing policy/strategy/service/council/school function (*check whether the original decision was equality impact assessed*)

Scope of the Equality Impact Assessment

Include any links to a previous equality impact assessment or work delivered by another Directorate/service/school or partner organisation. Describe the approach to be taken in data collection, stakeholder involvement and state who the stakeholders are.

Establish your monitoring and review arrangements.

Sources of evidence may include:

- *Service monitoring reports including equality monitoring data*
- *User feedback*
- *Population data – IW Facts and Figures (add link)*
- *Complaints data*
- *Published research, local or national*
- *Feedback from consultations and focus groups*
- *Feedback from individuals or organisations, other council departments, partner organisations etc*

Set out any data gaps that may need to be addressed and how you plan to address them and include in your action plan.

Analysis and assessment

Given the available information, what is the actual or likely impact on minority, disadvantaged, vulnerable and socially excluded groups? Is this impact positive or negative or a mixture of both? In particular set out how the council/school as a public body has met its duty to pay regard to eliminate unlawful discrimination, harassment and victimisation and advance the equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not.

Detail what concerns were identified during any consultation exercises together with any positive impact that has been identified and how this can be promoted or enhanced. Are there any concerns from consultation and data gathering that have not been taken on board, if so, please justify and explain the reason for this.

Does the proposal have the potential to cause unlawful discrimination (for example is it possible that the proposal may exclude certain groups of people from obtaining services or limit their participation in any aspect of public life?)

Set out in light of the consultation and data gathering what changes, if any you will make to the proposal

What can be done to reduce the effects of any negative impacts? Where negative impact cannot be completely diminished, can this be justified and is it lawful?

Recommendations

Please summarise the main recommendations arising from the assessment. If it is not possible to diminish negative impacts to an acceptable or even a lawful level the recommendation should be that the proposal or the relevant part of it should not proceed.

Action/Improvement Plan

The table below should be completed using the information from your equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Remove or lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age				
Disability				
Gender Reassignment				
Marriage & Civil Partnership				
Pregnancy & Maternity				
Race				
Religion / Belief				

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Sex (male or female)				
Sexual Orientation				
HR & workforce issues				
Human Rights implications if relevant				
Please remember - actions should have SMART targets and be reported to the Diversity Board (this should be done via your Directorate representative) or school board and incorporated into your service/team/school Plans and /or objectives of key staff				

Summary	
Date of Assessment:	
Head of Service/Director/Headteacher sign off & date:	
Legal sign off & date:	
Review date	
Date published	

Publishing checklist	Yes	No
<ul style="list-style-type: none"> • Plain English – will your EIA make sense to the public? • Acronyms – check you have explained any specialist names or terminology • Evidence – will your evidence stand up to scrutiny; can you justify your conclusions? • Stakeholders and verification – have you included a range of views and perspectives to back up you analysis? • Gaps and information – have you identified any gaps in services or information that need to be addressed in the action plan? • Success stories – have you included any positive impacts that have resulted in change for the better? • Action plan – is action plan SMART? Have you informed the relevant people to ensure the action plan is carried out? • Review have you included a review date and a named person to carry it out? • Challenge – has your equality impact assessment been taken to Diversity Board/Call Over/school arenas for challenge? • Signing off – has your Head of Service/Director/Headteacher signed off your EIA? • Basics – have you signed and dated your EIA and named it for publishing? • A signed version to be kept by your team for review and electronic version to be uploaded on to the council's/school's website 		