

Full Equality Impact Assessment- EIA

An EIA is a way of finding out if:

- Our services are accessible to service users and employees.

An EIA helps us to make sure that:

- Our functions and policies do not have a negative impact or discriminate in any way against any members of our local community.

A Full EIA needs to work through the following stages:

- ↓ **Establish clear aims & objectives-** What is the purpose? Who will benefit? What are the intended outcomes?
- ↓ **Consideration of data & information-** National & local data; service data; satisfaction/feedback data; complaints; research
- ↓ **Assessing the impact-** Who does/does not use service? Have you consulted? Does it reflect varied needs of community?
- ↓ **Reviewing/Scrutinising the impact-** Is there a differential impact on different groups? Is it adverse? Is it directly or indirectly discriminatory? *Show justification if applicable*
- ↓ **Addressing the issues-** Measures to alleviate impact; alteration to policy; action plans
- ↓ **Formal consultation-** Use appropriate methods; consult those affected or with legitimate interest; consult widely; ensure consultation is open, inclusive & accessible
- ↓ **Making a decision-** Explain decision & intended effects/benefits; monitor any actions
- ⇒ **Publication of results-** Accessible & user friendly; add website & intranet; notify consultees

Name of service or policy being assessed	Subsidised Pest Control Service		
Directorate	Economic Prosperity & Place	Is this a new or existing service or policy?	Existing
Officers completing the assessment	Technical Services Manager, WRS	Director	Mike Parker
Date	09/12/2019	Relevant Cabinet Member	Cabinet Member for Culture, Leisure and Community Protection

<p>Establish clear aims & objectives What is the purpose and expected outcomes?</p>	<p>Wyre Forest District Council is considering changes that can be made to ensure financial stability. As part of this the administration are considering the withdrawal of the subsidised service.</p> <p>The expected outcomes are for the Council to remain financially stable and that there will be some residents able to cover the cost of pest control themselves and others who do not undertake pest control treatments they would otherwise have had treated. This may give rise to pest infestations that could potentially be addressed through Public Health legislation to tackle any infestation.</p>
<p>Will there be any effect on other council procedures or strategies e.g. Corporate Plan or the <u>council's workforce</u>?</p>	<p>No</p>
<p>Are there any statutory requirements or implications?</p>	<p>Prevention of Damage by Pests Act 1949 requires the Council to take such steps as may be necessary to secure so far as practicable that their district is kept free from rats and mice</p>
<p>Are there any other organisations / bodies involved?</p>	<p>Worcestershire Regulatory Services (WRS) as shared service delivering pest control service and seven private pest control contractors who provide the service under a Framework agreement with Bromsgrove District Council as WRS host.</p>
<p>Consideration of data & information National & local data; service data; satisfaction/feedback data; complaints; research that is being used</p>	<p>Data from WRS regarding the location of properties that required some form of pest control service in 2018/19 together with the costs of service provision. Also considered approach in neighbouring authorities.</p>
<p>Assessing the impact Who does/does not use service? Have you consulted? Does it reflect varied needs of community?</p>	<p>The subsidised service is currently only available to those in receipt of specified benefits for specified pests. For some pests it is a contribution rather than a fully subsidised service. Full pest control options are available from the service provided by WRS to all residents for a fee depending on the type of pest to be treated. No consultation has taken place.</p>

What impact does the service / policy / project have on the nine protected characteristics as defined by the Public Sector Equality Duty 2010 – for definitions, please see overleaf.

Reviewing/Scrutinising the impact

Is there a differential impact on different groups? Is it adverse? Is it directly or indirectly discriminatory? Show justification if applicable

<p>1. Age</p>	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by age of recipient.</u></p>
<p>2. Disability</p>	<p>Positive/Negative Negative <u>Evidence: Those in receipt of benefits could include a greater proportion of disabled people.</u></p>
<p>3. Gender Reassignment</p>	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by gender of recipient.</u></p>
<p>4. Marriage and Civil Partnership</p>	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by marital status of recipient.</u></p>
<p>5. Pregnancy and Maternity</p>	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by maternal of recipient.</u></p>
<p>6. Race</p>	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by ethnicity of recipient.</u></p>

7. Religion or belief	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by religion of recipient.</u></p>		
8. Sex	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by sex of recipient.</u></p>		
9. Sexual orientation	<p>Positive/Negative None <u>Evidence: Ability to afford some payment towards service is unaffected by sexual orientation of recipient.</u></p>		
<p>Other e.g. Deprivation, health inequalities, urban/rural divide, community safety.</p>	<p>Data from WRS shows no correlation between location of service recipient and geography of the district. However, removal of the service will have preferentially negative impact on all residents in receipt of qualifying benefits as they currently are the only ones able to request this service. The qualifying benefits are those which would be received by members of the public on lower incomes and the least able to afford pest control if the service was removed.</p> <p>There is also a likely increased risk to community safety with members of the public using pest control treatments (specifically rat bait) without appropriate training or regard to risk to humans, pets or wildlife.</p> <p>On average 148 households a year will be adversely impacted (based on figures for last three financial years). This represented £68.67 on average last year per household requesting treatment, £77.06 the previous year and £80.89 in 2016/17</p>		
Can any differential impact be justified? (e.g. promoting equality of opportunity)		N	<u>Evidence</u>
Does any adverse impact amount to unlawful discrimination?		N	<u>Evidence</u>
<p>What alternative actions could be taken to mitigate any adverse impact? <i>(add these to the action plan)</i></p>	<p>In exceptional cases of hardship where treatments even with the reduced subsidy cannot be afforded, residents could approach the Council for support through the Welfare Assistance Fund.</p>		

Addressing the issues				
<i>Measures to alleviate impact; alteration to policy; action plans</i>				
ACTION PLAN				
Impact	Action required	Lead Officer	Timescale	Comments
Remove subsidy for treatment of all pests for residents on qualifying benefits.	Publicise revised approach on website and through social media	Director EP&P	Commencing 1 April 2020	<p>The following can be reported following the date of change and compared with levels prior to the change.</p> <ul style="list-style-type: none"> (i) The number of residents contacting WRS to complain about pest infestations at their neighbours properties: (ii) The number of rat infestations of sewers where baiting is requested of WRS; (iii) The number of complaints made to WFDC or Councillors concerning difficulty to pay for

				pest control.
Action Plan to be reviewed:	September 2020			

Formal Consultation	
What formal consultation has been undertaken? Use appropriate methods; consult those affected or with legitimate interest; consult widely; ensure consultation is open, inclusive & accessible	None
Making a Decision	
Explain decision & intended effects/benefits; Can the service/policy proceed?	The provision of a pest control service is discretionary. The Council cannot maintain a subsidised pest control service for financial reasons. The Council is able to ensure its statutory duty in relation to certain types of pest where an infestation is most likely to spread to neighbouring properties can be addressed through other service areas, such as Private Sector Housing enforcement of Public Health legislation. In extreme cases the Welfare Assistance Fund could be used to assist treatment of some properties. Some district councils in Worcestershire withdrew their subsidised pest control service many years ago – Worcester City and Malvern Hills.
How will the service/policy / actions be monitored and reviewed? <i>(please give timescale)</i>	Next review in September 2020 as part of annual fees and charges.
Publication of results	
	Any further changes will be updates to the policy on the website.

Accessible & user friendly; add website & intranet; notify consultees		
Signed Mark Cox	Date 9 th December 2019	
Signed 	Date 9 th December 2019	
Agreed by Chief Executive 	Date 9 th December 2019	

Prior to the Equality Act 2010, there were 3 separate public sector equality duties covering race, disability and gender. The Equality Act 2010 replaced these with a new single equality duty covering the following protected characteristics:

Protected characteristics: definitions

Age - where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Disability - a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment - The process of transitioning from one gender to another.

Marriage and civil partnership - marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity - pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race - It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief - religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism).

Sex - a man or a woman.

Sexual orientation - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes