

# Surrey County Council Equality Impact Assessment Template

## 1. Context of the Service or Policy

**Service or Policy being assessed** Home Authority –Review (Original EIA completed October 06)

**Assessor:** Michele Manson/ Andrew Pollard **Date:** 11<sup>th</sup> November 2008

**What are the aims of the service or policy? If this assessment is part of a project it is important to focus on the service or policy the project aims to review/improve**

(NB this should set out the aims and objectives of the policy or service)

Surrey County Council's Trading Standards Service vision is "Confident Consumers - Trusted Traders". Our mission is to target the work of Trading Standards closely on the needs of Surrey consumers and businesses, working in flexible and innovative ways and in partnership with others.

The Home Authority Principle (HAP) allows local authorities to work with a business to provide consistent and coordinated trading standards and food enforcement services across the UK. It assists those businesses that have outlets in more than one local authority and distribute goods and/or services beyond the boundaries of one local authority. (More information can be found at [www.lacors.gov.uk](http://www.lacors.gov.uk))

The Home Authority Principle helps effective communication between authorities and businesses and ensures the consistent application of legislation and advice. The Principle provides a single point of contact for businesses to access local authority experience and advice and creates a more coordinated approach to business locally and nationally. The application of HAP encourages good enforcement practices and is also effective in minimising duplication and reducing public expenditure.

LACORS (the Local Authorities Coordinators of Regulatory Services) hosts the Home Authority Database. Home authorities can and should keep up to date contact information on this Database for use by other authorities only.

In providing a way for local authorities to work effectively in partnership together with businesses to deliver robust and consistent enforcement and advice services across the UK, the Home Authority Principle is widely recognised and supported by local authority food and trading standards services and by Government departments and by trade bodies.

(It's worth noting that a new system is being developed by LBRO called the Primary Authority Scheme, which mirrors to some extent the principles of the current Home Authority scheme. The new scheme is hoping to be launched in the spring of 2009.)

**Who are the beneficiaries /users of this service or policy?**

(NB this should address needs of client groups and a review of barriers to policy or services)

The beneficiaries are: anybody who resides in, works, visits or has an interest in Surrey or who wishes to access a service provided by Surrey County Council. Also there are beneficiaries for consumers outside the county. By providing Home Authority support and advice to businesses we hope to make them more successful, stop unfair and deceptive business practices, help to achieve a fair and safe trading environment, and support Surrey's economy.

**What is the existing situation in relation to minority, disadvantaged and excluded groups in which this service/policy operates?** (including age, belief/faith, disability, Gender/transgender, sexual orientation, race and other general equality strands or issues that might make people vulnerable. NB this will require declaring what information is currently captured with respect to equality & diversity Monitoring) of this service or policy. It is also important to show the relevance of capturing this data.)

Awareness of the service according to sections of the community is not monitored as data is recorded by business type. Work has however been carried out by Trading Standards with Asian Traders in Woking which suggests that their general awareness of Trading Standards is low.

As far as I am aware SCC Trading Standards has never received any complaints from the public about discrimination, harassment or unequal outcomes in this service/policy area.

We are able to access Language Line for people for whom English is not their first language. We can get written requests translated via WITS (Woking interpretation service). Should difficulties with communication be encountered, staff are aware of the availability of language line and colleagues who speak languages other than English. Documents can, if required, be translated into other languages. The possibility of finding a business where no occupiers are able to communicate is considered to be a minimal risk, as this has never occurred. Our staff attend E&D awareness training, as well as new staff as part of SCC induction.

Leaflets and information are offered in different languages. However, due to prohibitive costs, a common sense approach would need to be taken if being asked to provide translations for a very small number of people. The Health & Wellbeing Team has a range of Food Standards Agency leaflets in several languages for traders that are useful for home authorities whom deal with food. This year work is being carried out to develop other leaflets in different languages to make advice more readily available to those who we often come across during our rogue trader and under age sales work i.e. Polish, Urdu etc.

All new food businesses are sent a list of food information leaflets available including the ones in different languages. There have been approx 30 requests for further information relating to the 'Food Leaflet Available on Request' leaflet that was sent to new food businesses in 2007/8, and approximately 6 (20%), have requested leaflets in a minority language.

It is a policy that all SCC Trading Standards consumer and trader leaflets should have a statement that:

*This information may be made available in an alternative language, large print, Braille, or on audio tape and computer disk.*

Our policy is to include a statement similar to the above on all mailshot letters offering the information in an alternative format. However, it is worth noting that current government guidelines on translation of publications, Communities and Local Government Guidance for Local Authorities on Translation of Publications, appears to favour the use of English language, with pictograms instead.

**2. Given what you already know, what is the potential for this service/policy to have a negative or differential impact on minority, disadvantaged, vulnerable and excluded groups or on race relations and community cohesion?**

Please summarise the negative impact identified due to age, belief/faith, disability, Gender/transgender, sexual orientation, race and other or general equality issues

**Age** – There are potential age related issues for older people, for example sight, hearing or mobility problems. However, it is important that staff do not make assumptions that older people will experience any of these difficulties when trying to access information or services.

**Belief/Faith** – Unless E&D awareness training is given to all members of staff including new recruits, there potentially could be a situation where a lack of awareness and understanding could be seen as insensitivity and have an unintended negative impact.

**Disability** – Some of the potential issues overlap with those for age, depending on the particular disability e.g. sight, hearing or mobility impairments; understanding of the principles of independent living and use of appropriate and up-to-date terminology which shows respect. Staff would need to ensure they maintain an up-to-date list of referral/support organisations with links to the Council.

**Gender/transgender** – Potential issues may arise in relation to transgender and transsexual issues so sensitivity needs to be displayed when collating information in relation to names and gender etc. However, this can be overcome by having an understanding of the issues and the potential impact of wrong assumptions and stereotypical views about different groups.

**Sexual Orientation** – No obvious issues here apart from a general understanding and acting in accordance with the Council's policy of fair treatment and access to services for all regardless of factors such as sexual orientation. As with disability and race, it is important the current preferred terminology is used e.g. gay as opposed to homosexual etc.

**Race** – There are possibly some issues about the availability of information in other languages. It is therefore important to know which languages are required and for staff to be aware about what is available. There may be some cultural issues too e.g. for different new migrant groups about understanding how local services are provided. In these cases evidence will need to be gathered of what the issues might be. A sensitive approach is needed when communicating with people who speak English but with a strong accent, and those where English is not their first language who are likely to have difficulty in understanding more complex information.

**Activities are covered by a nationally agreed protocol and are activated by a particular company size – trading across county boundaries. The type and suitability of relationship are discussed with representatives of each company and based on product type, number of issues etc. There shouldn't be potential for poor relations as all work is targeted at particular sized companies of all types.**

Please continue and attach a separate sheet if necessary

**3. Given what you already know, what is the potential for this service/policy to have a positive impact, such as tackling discrimination, promoting equality of opportunity and / or promoting good community relations, for minority, disadvantaged and excluded groups?**

Please summarise the positive impact identified due to age, belief/faith, disability, Gender/transgender, sexual orientation, race and other or general equality issues.

NB this would include positive initiatives delivery by the service or through the policy for any/all of these equality groups. What have been the outcomes or changes?

**Age** - There is no obvious positive impact for people who have particular beliefs or faiths.

**Belief/Faith** – There is no obvious positive impact for people who have particular beliefs or faiths.

**Disability** – The positive issues for people with disabilities are similar to those for older people generally. The Trading Standards building is fully accessible and provision is made for those who are hard of hearing, have sight impairments or are wheelchair users. (Please also see mailshot/leaflet statement below)

**Gender/transgender** - There is no obvious positive impact for this group.

**Sexual Orientation** – There is no obvious positive impact for this group.

**Race** – Should difficulties with communication be encountered, staff are aware of the availability of language line and colleagues who speak languages other than English.

Leaflets and information are offered in different languages. However, due to prohibitive costs, a common sense approach would need to be taken if being asked to provide translations for a very small number of people. The Health & Wellbeing Team has a range of Food Standards Agency leaflets in several languages for traders. This year work is being carried out to develop other leaflets in different languages to make advice more readily available to those who we often come across during our rogue trader and under age sales work i.e. Polish, Urdu etc.

Also, all SCC Trading Standards consumer and trader leaflets should have a statement that:

*This information may be made available in an alternative language, large print, Braille, or on audio tape and computer disk.*

We have a senior officer nominated as the single point of contact to provide advice to businesses within the Travelling community.

Please continue and attach a separate sheet if necessary

**4. Give details of involvement, consultation and or research undertaken for each relevant equality and diversity grouping, upon which this policy/service has had an impact either internally or externally.**

**What is the research telling you in relation to age, belief/faith, disability, race gender/transgender, sexual orientation and other equality issues?**

It is not practical or feasible to include equalities monitoring information in all aspects of Home Authority work because of the nature and size of the businesses. Equalities monitoring has not been sought in relation to Home Authorities. However, LACORS have in the past surveyed all companies who are part of the protocol including those in Surrey. The response from this area was limited, and again there was no indication of any equalities issues.

However, if resources are identified we could improve the consultation carried out. The work that is currently carried out is based on our own consumer and business satisfaction surveys with the questions based on National Indicators (NI's).

An E&D questionnaire is currently only included in our consumer satisfaction survey. We would need to carry out research to ascertain how we could gather data on the E&D grouping of businesses in Surrey, and how we would use this information. There would be a need for us to drill-down into different strata of information that the survey supplies, and determine whether there is consistent satisfaction of the service according to age, ethnicity, etc in relation to the make up of the county. It's worth noting that the satisfaction figures in the returns are so high that if you drilled into what we have (if that was possible) you wouldn't get a statistically reliable or meaningful answer. I think the first stage would be to check what the response rates are from different groups to see if we need to consider different methods.

Awareness of the service according to different sections of the community is not monitored as data is recorded by business type. Work has however been carried out by Trading Standards with Asian Traders in Woking which suggests that their general awareness of Trading Standards is low.

A balance needs to be found between equalities monitoring and ensuring that consumers are not questioned excessively.

Please continue and attach a separate sheet if necessary

- 5. Given your answers to the previous questions, how will your service or policy be revised to mitigate, reduce or eliminate negative impacts and enhance positive impacts for the relevant equality groups?**

(NB this is in effect the Recommendations to improve this policy)

Ensure that all staff involved in home authority work, are trained in equality and diversity and are provided with information on local demographics (SCC offer new recruits an induction day that covers E&D). *(This training has already been carried out, but we need to ensure that new team members have had this training)*

We could, if this was possible, carry out a sample survey of users asking for feedback on our home authority work; survey to include questions on gender, ethnic origin (use census categories), age, religion, belief and sexual orientation. However, this would probably be not relevant as the representative we speak to might not be the representative of the company. Ensure that everyone completing the survey is fully briefed as to why the questions are being asked and what will be done with the information\*.

Hold discussions with officers responsible for home authority work to gather their feedback – as to any equality related issues they may have come across which they found difficult to answer or which don't arise very often?

Review enquires and customer feedback over the past year to see if there are any themes or issues around equality or diversity that identify training needs or a need to review some policies. These questions are included in satisfaction surveys e.g. "were you treated fairly and courteously".

Consider improving our consultation practice – Current consultation includes a 2-yearly NOP survey of Surrey residents, *internal* consumer /business satisfaction surveys, information from our database, Consumer Support Network partnership, and questionnaires after educational talks\*.

If we do manage to do a business survey that takes into account ethnicity etc, there will be a need to drill-down into different strata of information that the consultation supplies, and determine whether there is consistent satisfaction of the Service according to age, ethnicity, etc. It might also be worth considering the possibility of commissioning an external consumer/business satisfaction survey\*?

Research has shown that when producing mail shot letters and leaflets, use of the offer to provide information in alternative languages/formats is patchy and therefore needs to be reviewed. We also need to take account of new government guidelines on translation of publications – these appear to favour the use of English language, with pictograms instead.

Staff would need to ensure they maintain an up-to-date list of referral/support organisations with links to the Council.

*\*Use the Policy and Public Affairs Service (PAPA) as a starting point, to ensure that any exercise is feasible and linked to existing consultations*

Please continue and attach a separate sheet if necessary

**6. Actions needed to implement the EIA recommendations:**

**Action Plan**

<b>Issue</b>	<b>Action</b>	<b>Expected outcome</b>	<b>Who</b>	<b>Deadline for action</b>
Research has shown that when producing mail shot letters and leaflets, use of the offer to provide information in alternative languages/formats is patchy and needs to be reviewed. We also need to take account of new government guidelines on translation of publications – these appear to favour the use of English language, with pictograms instead	Trading Standards management teams to assess the needs of all its customers and prioritise the removal of barriers to service take up.  Monitoring of Translation Requests reported to Trading Standards Management	Translation of campaign material including Food Information available in different languages  Increased awareness and take up of our service	Lead professional Food and Agriculture	Q3 09 -10

NB these actions should have SMART Targets  
Please continue and attach a separate sheet if necessary  
NB these actions should be reported to the Departmental Equality and Diversity Implementation Group (DIG) and incorporated into the Equality and Diversity Action Plan, Service Plans and/or personal objectives of key staff.

7. If no actions are to be taken with respect to the recommendations please give reasons below:

**Action plan review date: 18.03.09**

**Name of person responsible for review: Michele Manson**

**Name of person who carried out assessment:  
Michele Manson/ Andrew Pollard**

**Name Head of Service: \_\_\_\_\_ Signed: \_\_\_\_\_**

**Date Completed: \_\_\_\_\_**

1. Signed off electronic version to be kept in your team for monitoring and audit purposes
2. Send an electronic copy to the SCC 'Web Operations Team' for publication on the SCC website
3. Send Action Plan to DIG for review at its next meeting.

**Date sent to Web Operations Team:**

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