

Surrey County Council Equality Impact Assessment Template

1. Context of the Service or Policy

Service or Policy being assessed Premise Inspection – Review (Original EIA completed May 05)

Assessor: Keith Viviers/ Andrew Pollard **Date:** 7th October 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. We want to ensure that rogue traders are further isolated and illegal, unfair and unsafe trading practices eliminated or otherwise brought to justice. Trading Standards inspect business premises such as caterers, retailers, wholesalers, manufacturers, and importers both on a programmed and a reactive basis (based on risk) in order to assess compliance with relevant legislation through advice, education and information which links in with our Business Education work. The programmed visits by enforcement officers are usually unannounced and can be carried on a yearly (high risk), two yearly (medium risk), or five yearly (low risk) basis depending on a number of factors such as the size of the business, the type of product sold, confidence in management etc.

The programme of planned premises inspection is based purely on assessed risk and by type of premise. Therefore there is no potential for unlawful discrimination. In the case of reactive inspections, these are again carried out on the basis of risk or in response to a specific trading concern e.g. complaint about out of date food being sold, which has been brought to our attention.

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. By inspecting business premises we hope to stop unfair and deceptive business practices, help to achieve a fair and safe trading environment, as well as successful businesses, that ultimately supports 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.

Past projects, such as the Food & Agriculture Team's (now Health & Wellbeing Team) Appropriate Durability project 2004/5, had a check sheet and questionnaire that was completed at food establishments during inspections. The check sheet also had an E&D questionnaire on the back, however, the results were not felt to be a true reflection of the make up of the business as the food server rather than the owner of the business usually completed the questionnaire.

In 2007/8 Trading Standards contributed to the "Safer Food Better Business" partnership initiative, which aimed to help small businesses put in place food safety management procedures and comply with food hygiene regulations. In Spring 2007, TS took part in an event organised exclusively for Chinese caterers, and included information in Chinese and an interpreter.

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). We have a policy of intervening when there is a vulnerable adult person involved particularly elderly, disabled or customers who have English as a second language. We have a Trading Standards Officer who also has a role as a Vulnerable Person's Officer in relation to doorstep crime and rogue traders. He also has links to other agencies such as Social Services. 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. 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 approximately 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.

A recent mailshot to 2500 independent caterers in Surrey had a statement on the letter:

If required, the information in this letter may be made available in an alternative language, large print, Braille, or on audiotape and computer disk.

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.

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

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 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.

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?

The programme of planned premises inspection is based purely on assessed risk and by type of premise, therefore there is no potential for unlawful discrimination. In the case of reactive inspections, these are again carried out on the basis of risk or in response to a specific trading concern, which has been brought to our attention.

Age - We have a policy of intervening when there is a vulnerable adult person involved particularly elderly, disabled or customers who have English as a second language. We have a Trading Standards Officer who also has a role as a Vulnerable Person's Officer, who has links to other agencies such as Social Services.

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.

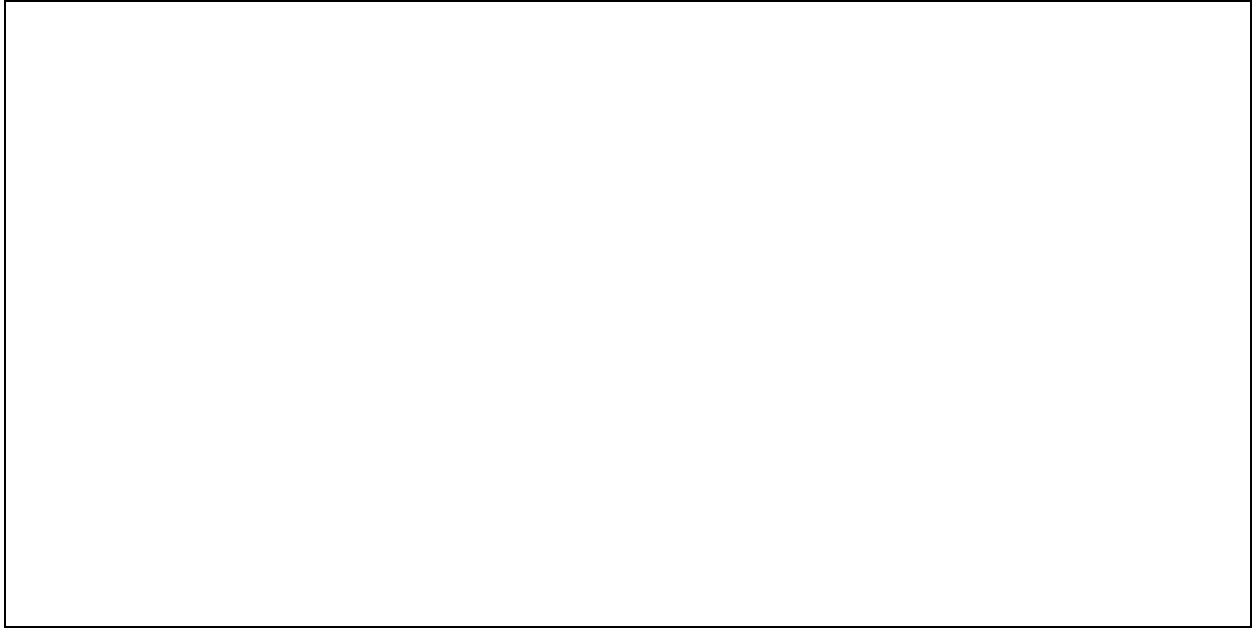
Race – Should difficulties with communication be encountered, staff are aware of the availability of Language Line and Woking Interpretation Service, and colleagues who speak languages other than English.

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 business education work. 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 (NIs).

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 inspections, 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).

Explore whether to send an officer on an awareness training session in relation to Gypsy, Traveller, and Romany cultures. So that they can advise SCC Trading Standards on relevant issues (*already carried out*)

Carry out a sample survey of users asking for feedback on our inspection work; survey to include questions on gender, ethnic origin (use census categories), age, religion, belief and sexual orientation. 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*.

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

Hold discussions with officers responsible for inspections 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 (so may not be generally known about).

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.

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.

There is 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 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.

It may be worth considering extra promotion of our service specifically aimed at ethnic minority businesses.

Please continue and attach a separate sheet if necessary

6. Actions needed to implement the EIA recommendations:

Action Plan

Issue	Action	Expected outcome	Who	Deadline for action
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 for Food Information and Health Eating 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: Andrew Pollard

Name of person who carried out assessment:

Keith Vivers/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:
