

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EIA) is required to ensure that equality is placed at the centre of policy development and review, as well as service delivery. The purpose of this EIA is to systematically analyse the likely impact of a service, policy or proposals on different community groups, and how the needs of such groups have been taken into account in developing those proposals.

The EIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group, on the grounds of any protected characteristic. It provides the opportunity to demonstrate the potential benefits for equality target groups arising from a proposed policy or project.

The need for an EIA stems from the general duty placed on public authorities to eliminate unlawful discrimination in carrying out functions, and promote equality of opportunity. This is outlined in the Equality Act 2010, with specific public sector duties in place from April 2011.

1. Name of Policy or Service (existing or proposed)	
Draft Mobile Homes Fee Policy	
2. Responsible Manager	
Peter Haywood	
3. Date EIA completed	Review date
29 September 2017	
4. Description and aims of policy / service (including relevance to equalities)	
<p>The government has introduced the Mobile Homes Act 2013, which changes the legislative arrangements relating to licensing of caravan sites (where they meet the definition of a “relevant protected site”). The 2013 Act enables local authorities to charge a fee for a variety of functions including (i) granting a new site licence; (ii) transferring or amending an existing licence; renewing a previously-granted licence on an annual basis; and retaining / publishing Site Rules.</p>	
5. Who are the stakeholders?	
<p>Council officers</p> <p>All Councillors including in particular the members of the Council’s General Licensing Committee</p> <p>Owners of caravan sites which meet the definition of a relevant protected site</p> <p>Residents who occupy a pitch on the above sites</p> <p>Also other stakeholders such as the Planning Department, the Local Fire and Rescue Service and the HSE.</p>	

6. What outcomes do we want to achieve?

Introduction of a fee-charging regime relating to relevant protected sites

7. How will performance be measured?

Whether a fee-charging regime is introduced

Number of licences granted / transferred / amended / renewed

Number of Site Rules deposited and published

Number of inspections (and subsequent enforcement work) carried out

8. Brief summary of research and background data

There are an estimated 208 pitches spread over 3 relevant protected sites in the Borough.

The 2011 Census confirms that the overall population of South Ribble is 109057. It is not known how many of these are resident on relevant protected sites.

It is suspected (though not backed up by any known data) that many residents on relevant protected sites will be elderly and/or in lower income groups.

There is no designated site for travellers in the Borough at the time of writing.

9. Methods and outcome of consultation

A consultation exercise has previously been undertaken in 2015, although the Policy was not subsequently introduced. No consultation responses were received.

The proposed consultation methodology is outlined in the accompanying committee report as follows:

- a) details of the consultation exercise will appear on the Council's website;
- b) all current owners of relevant protected site will be written to and advised of a formal 28 day consultation period, along with the ways in which any feedback may be submitted; and
- c) letters will be hand delivered to all residents of relevant protected sites.

10. Results of initial screening

The following questions have been considered in order to evaluate the various equality groups:-

Age – *Is there any concern that these proposals could cause differential impact on the grounds of age?*

It is anticipated that many residents of relevant protected sites will be elderly. The legislation permits site owners to pass on the cost of any licence fee to residents, meaning that elderly people could be disproportionately affected. However, it is considered that the cost to residents will not be excessive; if the cost of a site licence is c£300, and there are 70 pitches per site (208 pitches over 3 sites), then the cost which is passed on per pitch should not exceed £4.30.

Disability – *Is there any concern that these proposals could cause differential impact on the*

grounds of disability? Disability is recognised under the Equality Act as ‘a physical or mental impairment which has a substantial and long term effect on a person’s ability to carry out normal day to day activities.’

There is no evidence to suggest that there is a disproportionate percentage of residents of relevant protected sites who are disabled. However, the comments re “Age” above also apply.

Gender Reassignment – *Is there any concern that these proposals could cause differential impact on the grounds of gender reassignment? The Equality Act recognises this where a person is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for changing sex.*

N/a

Marriage / Civil Partnership – *Is there any concern that these proposals could cause differential impact on the grounds of marriage or civil partnership? Under the Equality Act, no such protection exists for single or unmarried people.*

N/a

Pregnancy / Maternity – *Is there any concern that these proposals could cause differential impact on the grounds of pregnancy or maternity?*

N/a

Race – *Is there any concern that these proposals could cause differential impact on the grounds of race? Race is recognised under the Equality Act as a person’s skin colour, nationality or ethnic origin.*

There is no information available on the balance of ethnic minority groups in relation to the residents of relevant protected sites.

Sex – *Is there any concern that these proposals could cause differential impact on the grounds of gender? Including men, women and transgender people.*

There is no information available on the gender balance of residents of relevant protected sites.

Sexual Orientation – *Is there any concern that these proposals could cause differential impact on the grounds of sexuality? Including heterosexual, gay, lesbian and bisexual people.*

There is no information on the prevalence of particular sexual orientation in relation to residents of relevant protected sites.

Religion or belief – *Is there any concern that these proposals could cause differential impact on the grounds of religion or faith? All faiths recognised in the European Convention of Human Rights are included.*

N/a

A commentary has been provided for each policy where appropriate – see Appendix A

11. Links with the Council’s Safeguarding Policy (please outline any implications and actions that need to be taken)

Inspections of sites by enforcement staff may provide valuable intelligence which can be used in support of the Council’s Safeguarding Policy.

12. Decisions and / or recommendations (including supporting rationale)

Members are asked to consider whether they wish to ask officers to explore implementation of the proposed Fees Policy.

13. Is an Equality Action Plan required?

No – see commentary in Appendix A below

Appendix A – Results of initial screening

Policy / service	Protected Characteristics									Commentary
	Age	Disability	Gender reassignment	Marriage / civil p'ship	Pregnancy / maternity	Race	Religion or belief	Sex	Sexual Orientation	
Introduction of proposed Fees Policy for Mobile Homes	P	O	O	O	O	O	O	O	O	There is no definitive evidence to suggest that the impact of the proposed Fee Policy would be disproportionate. .

Symbol	Impact
+	<i>Positive</i>
O	<i>Neutral / Negligible</i>
-	<i>Negative</i>
P	<i>Potential issue</i>