



Equality Impact and Outcome Assessment (EIA) Template - 2019

EIAs make services better for everyone and support value for money by getting services right first time.

1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed.

Title of EIA	New environmental enforcement measures	ID No.	
Team/Department	City Environment		
Focus of EIA	<p>The Environmental Enforcement Framework is reviewed on a regular basis to consider additional offences to be included to address anti-social and illegal behaviour and to minimise waste clean-up and disposal costs. It is proposed four new offences are added to the Framework following the cessation of the Field Officer Team and feedback from stakeholders. This includes enforcement measures for fly-tipping on private land, engine idling and estate / letting agent boards.</p> <p>Fly-tipping on private land: where the perpetrator of a fly-tip on private land can be evidenced, a FPN will be issued to perpetrator. Introducing this offence will support the council’s efforts in tidying up the city.</p> <p>Engine idling: upon witnessing an idling car, an Environmental Enforcement Officer will speak with the driver and notify them that they are committing an offence. The Officer will obtain their details, including the registration number of the car and normally issue the driver with a FPN. Introducing this enforcement measure will support the council’s efforts to become a Carbon Neutral City by 2023 and help improve air quality, producing a benefit for people with some health conditions, as well as all those that live in, work in or visit the city.</p> <p>Estate / letting agent boards: upon obtaining evidence that a board has remained in situ for longer than 14 days, an Environmental Enforcement Officer will make contact with the relevant estate agent, letting agent or managing agent to notify them that a FPN will be issued under the Town and Country Planning Regulations (2007). The FPN will be issued directly to the estate agent, letting agent or managing agent.</p> <p>Unlicensed mobile street trading: Upon being notified of an unlicensed mobile street trader, or if one is discovered whilst an Environmental Enforcement Officer is completing their daily patrols, the Officer will issue a CPW to the trader. This will provide an instruction for the trader to leave the area immediately and to not repeat illegally trading in any area of the city. If the trader repeats the offence, the trader will be issued with a CPN with a further instruction to not illegally trade. If the trader is found for a third time, a FPN of £100 will be issued to</p>		

the trader. Prosecution is also an option. Introducing this enforcement measure will ensure trading only takes place in designated areas, having received approval from the council. Traders that set up on council land without permission have a detrimental impact on licensed mobile traders and/or the amenity of the public space.

Visitors to the city can also be issued with a FPN if they are witnessed committing an environmental crime.

2. Update on previous EIA and outcomes of previous actions

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
N/A		

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age	<p>The population in Brighton & Hove in November 2022¹:</p> <ul style="list-style-type: none"> • 0-15 years: 44,750 • 16-64 years: 207,971 • 65+ years: 39,017 		<p>Fly-tipping on private land: no disproportionate impacts identified</p> <p>Engine idling: older people may keep their engine idling in colder months to stay warm.</p> <p>Estate / letting agent boards: no disproportionate impacts identified</p> <p>Unlicensed mobile street trading: no disproportionate impacts identified</p>	<p>Authorised Environmental Enforcement Officers have regard to the needs of vulnerable people and protected groups and apply this to the offences with the Environmental Enforcement Framework in a manner that is consistent, transparent and proportionate. Discretion is also applied.</p> <p>Communication on the new offences will include a news story and social media posts. Councillors will be briefed, and the council website will be updated to</p>

¹ [Local Insight \(communityinsight.org\)](https://www.localinsight.org/)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				inform members of the public about the offences.
Disability	There are 44,569 people (16.3% of the population) in Brighton & Hove whose daily activities are limited in some degree by a long-term health problem or disability ¹ .		<p>Fly-tipping on private land: no disproportionate impacts identified</p> <p>Engine idling: some people with certain disabilities keep their engine idling in colder months to stay warm.</p> <p>Estate / letting agent boards: no disproportionate impacts identified</p> <p>Unlicensed mobile street trading: no disproportionate impacts identified</p>	<p>Authorised Environmental Enforcement Officers have regard to the needs of vulnerable people and protected groups and apply this to the offences with the Environmental Enforcement Framework in a manner that is consistent, transparent and proportionate. Discretion is also applied.</p> <p>Communication on the new offences will include a news story and social media posts. Councillors will be briefed, and the council website will be updated to inform members of the public about the offences.</p>
Gender reassignment			No disproportionate impacts identified.	
Pregnancy and maternity	Data not available.		<p>Fly-tipping on private land: no disproportionate impacts identified</p> <p>Engine idling: pregnant people may keep their engine idling in colder months to stay warm.</p>	<p>Authorised Environmental Enforcement Officers have regard to the needs of vulnerable people and protected groups and apply this to the offences with the Environmental Enforcement Framework in a manner that is consistent,</p>

¹ [Equalities in Brighton & Hove: Data snapshot for equalities groups across the city \(bhconnected.org.uk\)](https://www.bhconnected.org.uk/equalities-in-brighton-hove-data-snapshot-for-equalities-groups-across-the-city)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			Estate / letting agent boards: no disproportionate impacts identified Unlicensed mobile street trading: no disproportionate impacts identified	transparent and proportionate. Discretion is also applied. Communication on the new offences will include a news story and social media posts. Councillors will be briefed, and the council website will be updated to inform members of the public about the offences.
Race/ethnicity Including migrants, refugees and asylum seekers			No disproportionate impacts identified.	
Religion or belief			No disproportionate impacts identified.	
Sex/Gender			No disproportionate impacts identified.	
Sexual orientation			No disproportionate impacts identified.	
Marriage and civil partnership			No disproportionate impacts identified.	
Community Cohesion			No disproportionate impacts identified.	
Other relevant groups Those on lower incomes	From January to December 2021 there were 8,300 workless households in Brighton & Hove (8.6% of households). No data is available on the number of		All offences: those on lower incomes may not be able to pay the FPN fine.	Payment plans can be set up for those issued with a FPN who are on lower incomes.

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	children within these households ¹ . In November 2022, there were 7,860 (3.8% of the population) out-of-work benefit claimants ² .			
Cumulative impact	N/A			
Assessment of overall impacts and any further recommendations				
No data is held on the individuals that have been issued with FPNs. There may be adverse or disproportionate effects on some protected groups. All communities should benefit long term from reduced environmental crime and better air quality as a result of introducing these new offences into the Environmental Enforcement Framework.				

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
As per footnotes in section 3			

5. Prioritised Action Plan

¹ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

² [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
For all groups	Authorised Environmental Enforcement Officers will apply discretion before issuing a FPN for example when a driver is clearing ice or snow from the car and the engine is idling.	Officers demonstrate discretion before issuing a FPN.	A limited number of FPNs are rescinded due to Officers not applying discretion.	Ongoing
	Deliver communications on the new offences, including a news story, social media, councillor briefing and updating the website.	Residents are informed of the new offences.	A reduction in fly-tipping on private land. A reduction in the number of car's idling across the city. A reduction in the number of estate and letting agent boards discarded across the city.	In the run up to and after new offences have been launched.

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Staff member completing Equality Impact Assessment:

Date:

Directorate Management Team rep or Head of Service/Commissioning:

Date:

CCG or BHCC Equality lead:

Date: