

Appendix C - Equality Impact Assessment (EQIA)



The characteristics protected by the Equality Act 2010 are:

Disability	Age	Sex (gender)
Gender reassignment	Marriage/civil partnership	Pregnancy/maternity
Race	Sexual orientation	Religion/belief

By law we must have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

In effect, this means that we need to ensure that our policies and services are fair, equitable and proportionate and where possible mitigate against any adverse impacts on people from the different protected characteristics.

In addition to the above protected characteristics you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.

The Rural-Urban definition, defines the rurality of very small census based geographies. Census Output Areas forming settlements with populations of over 10,000 (which are urban), while the remainder are defined as one of three rural types: *town and fringe, village or hamlet and dispersed*.

Details	
Service or policy title	Taxi Policy Review
Lead officer <i>(responsible for the policy or service/function)</i>	Emma Richbell, Food Safety and Licensing Assistant Manager
Officers carrying out the EQIA <i>(at least one must have done EQIA training and it is recommended that an officer responsible for the policy or service/function is involved in completion)</i>	Kay Sanders Katherine Green
Is this new or a revision? <i>(If revision state when previous EQIA undertaken)</i>	New
Is this the first time this policy or function has been assessed?	Yes
Date of completing this EQIA	24/06/2021

Description
<p>What exactly is proposed? <i>(Describe the service/policy and the changes that are being planned)</i></p> <p><i>Babergh & Mid Suffolk are attempting to align their separate policies into one uniform document to cover both districts. The main changes to the policies are as follows:</i></p> <ul style="list-style-type: none"> • <i>removal of the requirement of plates 1-20 in Babergh being any type of vehicle and 21+ as Wheelchair accessible only.</i> • <i>vehicle age policy amended/added for both councils.</i> • <i>Currently the Licensing Team undertake a knowledge test however there will be a mandatory requirement to undertake the 'Introduction to the Role of Professional Taxi and Private Hire Driver' course</i> • <i>New Safeguarding standards have been introduced by the Department for Transport and these are being assessed and incorporated where necessary.</i>
<p>Why? <i>(Give reasons why these changes are being introduced)</i></p> <p><i>Both Council's have been working together since 2012 but the policies have been vastly different. This review is to align the policy and processes so that officers can apply the same conditions across both districts. This will aid any driver wishing to work in both districts as the information would be the same. However, there is no automatic entitlement to work across both districts once licensed in a particular Council area.</i></p>
<p>What will the effect of the changes be? <i>(Describe which people, communities, localities etc. will be affected by the changes)</i></p> <p><i>Babergh has made no significant changes to their policies since 2007 and Mid Suffolk policy since 2011.</i></p> <p><i>The trade will be affected by the changes in policy:</i></p> <ul style="list-style-type: none"> • <i>Babergh Drivers for plates 1-20 have incurred an unfair revenue as this plate belongs to the company/proprietor until they wish to transfer. On transfer the individual sells the plate number on at a high price. This has led to a monopoly by certain operators and individuals which is unfair to other members of the trade.</i> • <i>Mid Suffolk Drivers have never had an age policy for their vehicle and a lot of them may find it difficult to finance newer vehicles.</i> • <i>The mandatory requirement to undertake the 'Introduction to the Role of Professional Taxi and Private Hire Driver' course will have a financial implication for driver's and operators.</i> • <i>The new safeguarding standards will have an effect on new licence applicants as well as existing licensed drivers as all criminal history will have to be considered by our Licensing and Regulatory Sub-Committee. The benefits of the new standards are that all drivers will be regulated to a higher standard and this in turn will ensure that the drivers on the road are fit and proper to hold such a licence.</i>

<p>How will it be implemented? <i>(Describe the decision-making process, timescales, process for implementation)</i></p> <p>The Policy will be going to Licensing & Regulatory Committee (LRC) in August 2021. This will be the first viewing of the policy and LRC will be asked to recommend this for consultation with the public and the trade. The consultation will run for 28 days, and the responses will be collated, and the policy will return to LRC in October 2021. If LRC are minded to the policy will be recommended to Cabinet for adoption and this meeting is in December 2021. There will be a Cabinet briefing prior to full Cabinet, and this is in November 2021.</p>
<p>When is it due to start? <i>(Planned start of new/revised policy/service)</i></p> <p>31 January 2022</p>
<p>Any other relevant details</p> <p>N/A</p>

<p>Data about the population</p>	
<p>What is the demographic profile or make up of the community you are serving? <i>(A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)</i></p> <p>Population typical for rural Suffolk – increasing elderly population, small population of black and ethnic minority residents. The source for our data is see Suffolk Observatory – Equality Impact Assessment</p>	
<p>What is the profile or make up of your service users by protected characteristics? <i>(Where this data is available. If it is not currently available state any plans to collect this in future)</i></p> <p>A survey is currently in the process of being undertaken for wheelchair users in Babergh on the advice of our Equalities team. The consultation on this policy will provide any further insight into needs/requirements.</p>	

<p>Implications for communities and workforce</p>	
<p>Disability</p>	
<p>What is the impact on people with a disability (including children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>There is no differential impact on people with a disability. The Taxi Policy is applicable to all who use this service.</p>

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<p>How does it have a positive or negative impact?</p>	<p>Disabled adults appear to rely more on the bus and on taxis according to DfT national data, which shows that the proportion of trips with taxi/minicab as the main mode was small but noticeably higher for disabled adults. Nationally wheelchair users and disabled persons are statistically more likely to use taxis than persons who do not identify themselves as disabled. The demand for vehicles and drivers may increase however the cost implications for the process may deter individuals from applying reducing the availability of Wheelchair accessible Vehicles.</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>The alignment of the policies and the introduction of the new safeguarding standards will ensure that the travelling public are receiving the best service from the trade as the policy is attempting to ensure all applicants are fit and proper for the job role and are better regulated. Some potential mitigation may be provided by ensuring local disability groups are effectively involved in the consultation process.</p>
<p>Age</p>	
<p>What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>There is no differential impact on people of different ages. The Taxi Policy is applicable to all who use this service.</p>
<p>How does it have a positive or negative impact?</p>	<p>In terms of age, surveys by the DFT have identified that young adults and elderly persons are more likely than other age groups to use taxis on a regular basis. The service isn't age restricted however if the process deters individuals from applying there may be a reduced capacity by companies to aid these individuals which could lead to isolation.</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>The alignment of the policies and the introduction of the new safeguarding standards will ensure that the travelling public are receiving the best service from the trade as the policy is attempting to ensure all applicants are fit and proper for the job role and are better regulated. Some mitigation can be achieved by effective consultation.</p>
<p>Sex (gender)</p>	
<p>What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>There is no differential impact on people of different genders. The Taxi Policy is applicable to all who use this service.</p>
<p>How does it have a positive or negative impact?</p>	<p>N/A</p>

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What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Gender reassignment	
What is the impact on people who have undergone gender reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people who have undergone gender reassignment. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Marriage/civil partnership	
What is the impact on people who are married or in a civil partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people who are married or in a civil partnership. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Pregnancy/maternity	
What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people who are pregnant or who have a young child. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

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Race	
What is the impact on people from different races or ethnic groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people of different races. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Sexual orientation	
What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people of different sexual orientations. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Religion/belief	
What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no differential impact on people of different religions or beliefs. The Taxi Policy is applicable to all who use this service.
How does it have a positive or negative impact?	N/A
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

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Rurality	
Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.	
What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Both Districts are predominantly rural however Babergh is slightly more urbanized regarding the location of its Taxi services. The Taxi policies have historically remained as separate entities under each council. However, the officers whilst reviewing this policy have taken into consideration that the benefits of a single policy outweigh any concerns regarding its alignment.
How does it have a positive or negative impact?	The negative impact of the changes proposed in this policy is there may be a decrease in the applicants for a position as a Hackney Carriage and Private Hire Driver. As both districts are rural this could lead to a higher reliance on bus services which are sporadic in the districts and may lead to isolation of vulnerable groups.
What could be done to mitigate any adverse impact or further promote positive impact?	Some mitigation can be achieved by effective consultation.

Making Decisions	
Having completed this equality impact assessment indicate which decision is recommended to be taken.	
Should the policy or service be implemented as the correct course of action?	Yes
Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	No
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	No
Should the policy or service not be actioned as there are too many negative impacts?	No

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Monitoring Impact	
Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented.	
How frequently will the policy or service be reviewed?	Three Yearly
Who will be involved?	Licensing Officers, Licensing and Regulatory Committee, Cabinet
Will there need to be an action plan completed for any amendments?	No
What further evidence or consultation will be needed to check that the policy or service is working well?	Complaint monitoring and Disability Forum feedback

Completion	
Authors signature	Kay Sanders Katherine Green
Date of completion	24 June 2021

Additional sources of data can be found on the following links:

<http://www.suffolkobservatory.info/Default.aspx>

<http://www.nomisweb.co.uk/>

<https://www.ons.gov.uk/>

<http://suffolkcf.org.uk/publications/hidden-needs-2016/>

<https://www.nao.org.uk/>