

HDC Due Regard (Equality Analysis)

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

For help with this template please view the guidance document, which contains advice to assist you when you are considering the impact (both positive and negative) of the proposed actions on each of the protected equality characteristics.

Name of policy/procedure/function/service being analysed: New policy for Street Collections

Department and section: Licensing

Name of lead officer: Sarah Greenway

Other people involved (assisting or reviewing - including any service users or stakeholder groups etc.): Julie Clarke

Date assessment completed: 3rd November 2014

Step 1: Defining the policy/procedure/function/service

Is this a new, amended or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

New policy for Street Collection

The main changes to the new street collection policy have been summarised as per below. In producing this policy the aims of the licensing authority are to impose the following types of restrictions:

- Street collections are usually to be made by charities registered with the Charities Commission only
- Collections are to take place in town centres only
- Money must be collected in appropriate vessels
- The person organising the collection is required, after it has taken place, to make a statement to the licensing authority as regards the sums received

The purpose of these limitations is to ensure that collectors are properly authorized, that donations are receipted and stored in a secure

way and that the total proceeds are properly accounted for. Additionally, Council's often impose limitations on how many Street Collection permits will be granted for a specific area at any one time – this is to prevent street collections from becoming a public nuisance (often referred to as “collection fatigue”). The Council's current policy is outdated and a new draft policy has been written.

The main changes to the new street collection policy have been summarised as per below:-

- To ensure that promoters and collectors are properly authorised.
- To ensure that money collected is done so in a secure way and the total proceeds collected are properly accounted for.
- To minimise nuisance to residents and visitors to Harborough district.

Step 2: Data collection & evidence

What relevant evidence, research, data and other information do you have and is there any further research, data or evidence you need to fill any gaps in your understanding of the potential or known affects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

Information is being captured on both successful and unsuccessful applications in relation to street collections to help inform future development of the policy.

An analysis has been carried out for the last calendar year and a total of 26 street collections had been authorised for that period. The information below sets out a breakdown of the types of charities:-

Type of Charity	No of authorised collections
Cancer	2
Recovery Wellbeing	3
Phoenix Children	1
Market Harborough Scouts	1
Healing UK	3
Children's Hearts	1
Shopmobility	1
Friends of the Earth	1
Air Ambulance	1
Greenpeace	1
Little Stars	1
Alzheimers	1
Save the Children	2

Guide Dogs for the Blind	1
Friends of the Earth	1
Amnesty International	1
Red Cross	3
RNLI	1

Five street collections were refused within the last calendar year and these were related to Together Funding, Air Ambulance and Phoenix Children. All of these were refused on the grounds that too many requests had been received for dates which had already been allocated. Only one street collection is currently permitted to take place within the District at any one time and any one place. Permits are allocated on a first come first served basis at the moment. However the new policy will only allow one organisation a maximum of 5 collections per year to prevent them block booking numerous days at a time and not collecting. This block booking has, in the past, prevented other charities from collecting at a time that suits them.

Financial statements are returned to the local authority upon completion of the collection. The average value for the collections carried out within the last calendar year equates to £135.00.

Step 3: Consultation and involvement

Have you consulted and if so outline what you did and who you consulted with and why.

A full public consultation will take place for a period of 12 weeks. Once they have been received, responses will be taken into account to adapt the policy as necessary. Equality questions will form part of the questionnaire to enable analysis to take place.

Formal consultation will also be undertaken with organisations that have held licences for both street and house to house collections, the Charity Commission and the Highways Department of LCC as Landowners. The consultation will be open for a period of 12 weeks and will be available to view at www.harborough.gov.uk. Emails/letters will be sent out to draw attention to our consultation process. This will include organisations who have held street collection licences within the last 2 years, local authorities within Leicestershire and Leicestershire Constabulary.

Customer Services staff at Harborough will also encourage customers to complete the consultation, and be available to guide those who require assistance through the online questionnaire form. Copies of the consultation will also be made available upon request in alternative formats. The consultation documentation incorporates Plain English standards.

Step 4: Potential impact

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

Age: There were only 6 specific age related charities who made requests within the last 12 months. Phoenix Children requested 1 collection, Little Stars requested 1 collection, the Scouts requested 1 collection, the Children's Hearts requested 1 collection, Save the Children 1 collection and Little Hearts requested 1 collection. Under the new policy these charities would be allowed to apply for no more than 5 collections per year in respect of a street collection but this far exceeds their requests in the last year so should not have a negative impact on people with age related characteristics.

Disability: There were 3 applications made by disability related charities in the last 12 months. The new policy, which allows individual charities no more than 5 collections per year in respect of street collections, should not have a negative impact on people with disabilities as each individual charity organisation is allowed up to 5 collections per year. Looking back to previous requests no refusals would have been made on the basis of exceeding the new guidelines.

Sex (gender), Pregnancy & Maternity, Marriage & Civil Partnership, Race and Religion & Belief - There have been no requests related to these specific protected characteristics over the last 12 months and the change in policy has been designed to ensure that there is a fairer opportunity for both local and national charities to apply to collect so there should be a positive impact on those charities who would like to collect in the area but have been prevented or put off by lack of availability in the past.

Gender Reassignment & Sexual Orientation No requests have been made from charities relating specifically to the Lesbian, Gay, Bisexual and Transgender communities over the last 12 months, but statistics show that people from these communities are often more likely to be homeless or experience mental ill health. The new guidelines which intend to ensure fair allocation and better availability of dates for collections will hopefully ensure that there is a positive impact on charities which would be able to provide help and support to these communities by ensuring that there is suitable availability if requested.

Step 5: Mitigating and assessing the impact

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required

to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs have identified can be addressed.

At this time there do not appear to be any negative impacts for any protected group. However, the new policy will be monitored closely and the reasons for any refusals recorded so that any potential disadvantage can be responded to as soon as practicable.

Step 6: Making a decision

Summarise your findings and give an overview of whether the policy will meet Harborough District Council's responsibilities in relation to equality, diversity and human rights. Does it contribute to the achievement of the three aims of the Public Sector Equality Duty - eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations?

All key stakeholders have been and will continue to be consulted and involved in the new policies for the house to house and street collections. The Council has also taken into consideration policies from other local authorities in Leicestershire, who have in the last two years revised their policies for house to house and street collections.

The new policies have been designed to ensure impartiality and fairness in determining house to house and street collections

Step 7: Monitoring, evaluation & review of your policy/procedure/service change

What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness and make positive improvements? How frequently will monitoring take place and who will be responsible?

The Policy should be reviewed within two years following its implementation. Breakdowns of future requests, authorisations and refusals will be kept to show if the policy has any unexpectedly negative or positive impacts.

Equality Improvement Plan

Equality Objective :

Action: Review policy within 2 years of implementation

Officer Responsible: Sarah Greenway

By when: November 2016

Equality Objective :

Action: Collate information on characteristics of charities and values.

Officer Responsible: Sarah Greenway

By when: November 2015

Equality Objective :

Action:

Officer Responsible:

By when:

Equality Objective :

Action:

Officer Responsible:

By when:

Signed off by: Julie Clarke

Date: 11th November 2014

Once signed off, please forward a copy for publication to Julie Clarke, Equality and Diversity Officer
e-mail: j.clarke@harborough.gov.uk , telephone: 01858 821070.