

# West Lothian Council: Equality Impact Assessment

## A. About the function, service, policy, procedure, project etc

1 What is the name of the function/service/policy/procedure/project etc (called “policy” from this point) to be assessed?

- Anti Social Behaviour

2 What were the results of the screening for relevance?

- The parts of the general duty covered are, eliminating discrimination where it exists, providing equality of opportunity and encouraging good relations between different groups of people in the community.
- There is no evidence to believe that any groups of people are intentionally or indirectly treated differently or in a discriminatory manner.
- It was found that further development is required in areas of policy and practice that would make the team more effective as a whole. This in turn benefits all the different groups and individuals the team works with.
- Due to the nature of the service that this team delivers, many of the customers that come into contact with the team are upset, vulnerable or distressed. However, this is due to their situation and not the manner in which the team deals with them. There was no evidence that the practices of the team in any way discriminate against these people, or that was any perception of this amongst feedback from customers and the public.
- Due to the complex nature of the team and the vast array of partners it touches in the course of its work it was felt that a full assessment would be beneficial to demonstrate their commitment to transparency and honesty in service delivery.
- There have been no complaints on discrimination regarding the NRT.
- There are several general areas for improvement that must be taken into consideration as part of any future service development or review.

3 Briefly describe the aim of the policy etc.

What needs or duties is it designed to meet? Who are the intended beneficiaries? How will it affect employees? How will it affect the community and the different groups of people within it?

Is the service contracted out or delivered under a service-level agreement or with partners? Who else is involved?

In what way will you involve any of these people in the impact assessment process?

The Neighbourhood Response Team (NRT) was piloted in 2003 within Housing & Customer Services to tackle antisocial behaviour and its root causes in West Lothian. The team operates to this day in broadly the same manner as it did upon its launch – a specialist team working in tandem with Housing Services and other partners on prevention, intervention and enforcement issues towards safer, peaceful communities.

The team connection with housing stems not only from the origins of funding, but from the concept that everyone should have the right to enjoy their home and community in peace – an idea pivotal to achieving excellence in front line housing service provision.

A variety of approaches and measures are at the disposal of the team to achieve their goals. This begins with high quality public information, a solid profile within the council and the public, incorporates measures such as targeted campaigns, specialist staff, strong partnerships and legal capabilities. This legal enforcement includes the use of Acceptable Behaviour Contracts, interim Antisocial Behaviour Orders (ASBO's) and full ASBO's.

The partnerships that the team has are crucial to its success, in particular, close work with Housing staff, the police, Victim Support and those with a connection to the Community Safety agenda are vital. The team also works with other local Registered Social Landlords in improving the safety of non WLC properties. In a similar manner, the team has considerable contact with the owner/occupier sector as their remit also covers non tenants.

The team are currently based within Lomond House in Livingston having outgrown their previous accommodation in Blackburn. The management structure includes a Team Manager and overall, a Customer Service Manager. The team operate a shift system, with a dedicated night team in place; there is also cover available during some hours of the weekend. The team have expanded from containing mostly housing staff to include Neighbourhood Response Officers, a Youth Officer, Environmental Health Officers, an analyst, a Landlord Registration worker and a seconded Police Officer. An officer from Victim Support is also based within the office on a part-time basis. Each NRT officer has a geographical 'patch' that they cover, and they hold responsibility for any ASB cases within that area, they are also a link for the relevant Housing Office within that specific area.

The NRT achieved a Chartermark in February 2007, they are currently working towards retention with their annual surveillance 2008. The team will change to the new framework the following year.

## **B. Gathering the evidence and assessing the impact**

- 4 Is there any evidence (or reason to believe) that this policy could have a different effect on some groups of people compared to others? (e.g. different needs, different experiences, different outcomes, different rates of participation, different

abilities to access opportunities).

Is there an adverse impact around race, gender, disability, faith, sexual orientation, age, health, etc? What are the reasons for this adverse impact?

- There was no specific adverse impact identified around any one group. The recommendations of the recent assessment and review report centre around improved communication, establishment of new links in the community and development of staff and quality monitoring.
- These improvements will improve the performance and practices of the team as a whole, rather than focusing on one particular strand.

5 Please describe the evidence or reasoning you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Tell us about the information as it applies to different groups (e.g. by race, gender and disability etc).

- Interviews with staff and partners
- Documentation/forms/file checks
- Full review of policies/procedures
- Assessment & Review report (mock inspections in line with Communities Scotland inspection framework)
- Satisfaction surveys/feedback/views of staff outwith the team
- Outcome of Communities Scotland Inspection Report
- WLAM/Chartermark evidence

This information deals with all strands of equality.

6 Are there any unmet needs/requirements that can be identified that affect any of the specific groups?

- No

## C. Making changes and promoting equality

- If in your judgement, the policy etc does have an adverse impact, can you modify the policy to reduce/eliminate any adverse impact?

You need to think whether your modifications will:

- have a positive or negative effect on the promotion of equality of opportunity for any group
- help eliminate discrimination in any way
- encourage or hinder community relations.

- The recommendations that arose from the recent assessment & review inspection and this assessment will benefit the team through making them a more efficient and joined up unit. This will automatically have great benefits in promoting the work of the team within the communities of West Lothian. The remit of the team is to deal with inequality from all strands as part of their work, therefore this will have a positive effect, help eliminate discrimination and encourage better community relations.

- 8 If you cannot modify the policy to reduce adverse impact, consider if the impact can be justified and explain. (It is unlikely that you will be able to justify any impact which amounts to unlawful discrimination.)

If the impact cannot be justified, how do you intend to deal with it?

- Full review of policies and procedures is to be addressed as part of the restructure/review.

## D. Consultation

- What steps have you taken/are you taking to consult externally as part of your assessment?

Whom have you consulted? What methods did you use? How long was the consultation period?

Have you consulted any “experts”? Did you involve any people in the affected groups in some other way during the process?

- Within the theme of antisocial behaviour key staff, partners and areas were identified at an early stage as being critical to obtaining a full picture of policy and

procedure, processes, gaps and good practice. These are:

- Staff within the Neighbourhood Response Team (NRT)
- Staff within the new Safer Neighbourhood Team (SNT)
- Lothian & Border Police
- WLC staff involved within the Community Safety agenda
- External partners linked with the teams and community safety
- Housing & Building Services staff
- Legal Services staff
- Out of hours team members
- Staff involved with leadership and performance reporting on antisocial behaviour

A list of internal and external staff were identified as being involved in the provision of Anti Social Behaviour services in West Lothian.

Staff identified were then asked to attend an interview which took approximately 1 hour.

To ensure a consistent approach an Assessment Framework/General Findings questionnaire was used. Areas which were not appropriate to the interviewee were not asked.

Publications, incident diaries and files were looked at. Reporting mechanisms were viewed and consistency of information was also investigated.

This information was used to form the report and produce recommendations for consideration.

Interviewees were encouraged to discuss all aspects/views of their involvement with Anti Social Behaviour including any areas not covered in the themes and suggest areas for improvement

Those involved had the opportunity to comment on the report and make suggestions.

## E. Next steps

10 What were the results of the consultation?

What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

- The action plan for improvements has been attached to the Assessment & Review report. This has now been agreed by all parties. This is the main driver for improvement within the service and is fully consulted on. The

recommendations pertaining to equalities work will be included here and included on the consultation/comment pages within our public website.

11 Have you published the results of that consultation? If so, where? What arrangements were made to reach specific groups affected?

- Housing & Building Services Website – specifically the pages designed for comments and feedback.

12 What are your recommendations based on the conclusions of this assessment?

- Publicity and raising the profile of Anti Social Behaviour service should be planned and implemented.
- Anti Social Behaviour processes & procedures should be reviewed, including tools, equipment and Risk Assessment. This should be fully documented and assessed for impact to reflect the introduction of the Safer Neighbourhood Teams and the unique role of the team involved in challenging situations.
- The mediation service provision is currently being reviewed. A decision on how best to deliver this to customers should be made with procedures and timescales in place.
- Review/expansion of the performance information produced through existing QIT including the current role of analyst
- Quality Assurance protocols need to be established for NRT and SNT
- Communication with frontline services, Housing and throughout WLC needs to be improved
- Ensure that internal and external partnership meetings are attended on regular basis to ensure that information sharing is current and relevant

13 Please provide us with separate information about how you intend to monitor this policy in future. What is the review date set for this policy?

- This will be monitored via the Housing & Building Services rolling inspection programme. This should be done in no less than 3 years

14 How will you publish the results of this assessment? What methods will you use? What arrangements are there to reach specific groups affected?

- Housing & Building Services Website – specifically the pages designed for comments and feedback.
- Service users are advised via letter and publicity that the assessments are available for comment/perusal.

15 Have you conducted any other types of impact assessment on this policy? (e.g. health, financial, environmental).

- n/a

16 Is there anything else you wish to add?

- n/a

Assessment made by:	Sarah Kelly/Frances Eglinton
Others involved in assessment:	<ul style="list-style-type: none"> <li>• Staff within the Neighbourhood Response Team (NRT)</li> <li>• Staff within the new Safer Neighbourhood Team (SNT)</li> <li>• Lothian &amp; Border Police</li> <li>• WLC staff involved within the Community Safety agenda</li> <li>• External partners linked with the teams and community safety</li> <li>• Housing &amp; Building Services staff</li> <li>• Legal Services staff</li> <li>• Out of hours team members</li> <li>• Staff involved with leadership and performance reporting on antisocial behaviour</li> </ul>
Summary of assessment (this will be published).	
<ul style="list-style-type: none"> <li>▪ What you did</li> <li>▪ What evidence you used</li> </ul>	<p>Screening for relevance of Housing &amp; Building Services Complaints &amp; Appeals procedure &amp; full impact assessment on equality</p> <p>Findings of Assessment &amp; Review Report, customer feedback, interviews, house files, policies/procedures on ASB, previous inspections, WLAM, Chartermark</p>

<ul style="list-style-type: none"> <li>▪ What you found</li>   <li>▪ What consultation you undertook</li>   <li>▪ What changes you made</li>   <li>▪ What will happen next.</li> </ul>	<p>evidence</p> <p>No evidence of discrimination against individuals or groups</p> <p>The need for an overall review to improve service delivery/team working which would benefit all the groups that the team works with.</p> <p>Full report consultation, this report will be on our website for further comment from the public.</p> <p>None</p> <p>Publication of this report on Housing &amp; Building Services website</p>
<p>Manager's Signature</p>	
<p>Date:</p>	<p>April 2008</p>
<p>Service area and job title:</p>	

When you have completed this form, please take a copy and send it to your service representative on the Corporate Working Group on Equality and/or the Equality Officer.