

EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

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| Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal) | Cumulative Impact Policy – Brick Lane |
| Directorate / Service | CLC, Safer Communities, Consumer and Business Regulations Service |
| Lead Officer | David Tolley |
| Signed Off By | |

| Stage | Checklist Area / Question | Yes / No / Unsure | Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify) |
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| 1 | Overview of Proposal | | |
| a | Are the outcomes of the proposals clear? | Yes | This report presents the findings of the recent consultation that has been conducted, the context, evidence and justification for adoption and explains the process required for implementation. Under the Licensing Act 2003, the Council have the power to designate an area within the Borough a "Cumulative Impact Zone" if it feels that the number of licensed premises is having an adverse impact on any of the Licensing Objectives (crime and disorder, noise / nuisance, public safety and harm to children). In partnership with the Police and the Council it is proposed that the Council adopt a Cumulative Impact Policy (saturation zone) for the Brick Lane area on the basis of the high levels of crime, anti-social behaviour and alcohol related harm. |

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| | | | <p>The effect of adopting a special policy for a Cumulative Impact Zone is to create a “rebuttable presumption” that applications for new premises licences or club premises certificates or variations that are likely to add to the existing cumulative impact will normally be refused, following relevant representations.</p> |
| b | <p>Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?</p> | Yes | <p>If a saturation policy is introduced, the policy will allow the Council to reject certain licence applications that will otherwise increase the cumulative effect of licensed premises in the Cumulative Impact Zone. The area’s economy is dynamic and the extent to which future licence applicants will fall in to any particular protected group is unknown. Information is available on the residential demographics of the area which has a high level of Bangladeshi residents. There has been increasing levels of friction between residents and businesses specific to the impacts of the late night economy on quality of life and strong local support for introduction of the new policy across the residential community.</p> <p>Residents and visitors in and around the Zone will be benefited by a safer environment facilitated by the policy and continuing community safety activities by partners including the Police and the Council.</p> <p>Existing businesses in the Zone will continue to operate as normal even after the introduction of a Cumulative Impact Zone. They will also benefit from a safer environment facilitated by the policy and other community safety activities.</p> <p>Once this policy is introduced, licence applications that would increase the cumulative effect of licensed premises in the Zone (e.g. on and off alcohol sales and late night openings of</p> |

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| | | | <p>takeaways/restaurants) would be normally refused. Although the service has monitored and will continue monitoring the applicants' protected characteristics, the majority of the applicants are companies, who may be owned by people in different equality strands from those who operate the business premises in the Borough.</p> <p>The Development and Renewal (D&R) directorate have corporate lead responsibility for Business related data capture and are currently reviewing the technical implications in developing an equalities strand of their business data base.</p> |
| c | <p>Is there a narrative in the proposal where NO impact has been identified? Please note – if a Full EA is not to be undertaken based on the screen or the fact that a proposal has not been 'significantly' amended, a narrative needs to be included in the proposal to explain the reasons why and to evidence due regard</p> | No | <p>It is likely that the majority of impacts resulting from this policy will be positive on the health, safety and quality of life of all the protected groups.</p> <p>207 Licensed Premises (23% of the total premises in the borough) is concentrated in the small area (the proposed area is 2.85% of the total area of the borough). The reports states that it is contended that the numbers of licensed premises in the Brick Lane area have reached a saturation point and there is a need to stop any further licences being issued or variations being made. The data shows that there are clear demonstrable links between violence against the person offences and alcohol-related violence in the area.</p> <p>As above, this policy's impact on future applicants who are companies remains unknown. The technical implications in developing an equalities strand of the Council's business data base has been reviewed by D&R that have corporate lead responsibility for Business related data.</p> |
| 2 | Monitoring / Collecting Evidence / Data and Consultation | | |
| a | Is there reliable qualitative and quantitative data to | Yes | The reports include detailed analysis of the data that illustrate |

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| | support claims made about impacts? | | <p>the current problems occurring in the area, including:</p> <ul style="list-style-type: none"> - The area is the largest Street Drinking complaints hotspots (12%, April 2011 – March 2012) - 22% of all police calls to Licensed Premises are in the area - The wards that contain and surround the Saturation policy area have the highest rates for Violence Against the Person. - There has been steady increase in notifiable offences, criminal damage and drug offences, - There has been steady increase in ambulance call outs in the area. - The borough has the second highest level of ASB in London and the highest rates of ASB in the borough occur in the Brick Lane area. <p>The service conducted an extensive consultation process between 21 December 2012 and 22 March 2013. Licence holders, residents groups, responsible authorities and interested networks/forum and 165 responses were received. 81.4% of the respondents (127 out of 156) responded that they support the establishment of a saturation policy/zone in the Brick Lane area. It was found that in different groups (i.e. gender, age, disability, sexual orientation), there were responses that both favour/ do not favour the proposal. Although the number of respondents identified as Asian (Bangladeshi and Pakistani) were small (10 out of 123), all identified respondents of this group favoured the proposal.</p> |
| | Is there sufficient evidence of local/regional/national research that can inform the analysis? | Yes | See above. |
| b | Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis? | Yes | <p>The Police and community safety support services and relevant partners have been engaged in the development of this policy proposal.</p> <p>The consultation process held between 21 December 2012</p> |

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| | | | and 22 March 2013 was extensive. A public event was held to enable interested parties to discuss the proposed policy. The Council's Licensing Committee were also consulted as to the scope and effect of the proposed policy. |
| c | Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal? | Yes | Licence holders, residents groups, responsible authorities and interested networks/forums were consulted. |
| 3 | Assessing Impact and Analysis | | |
| a | Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics? | Yes | See above. It is likely that the majority of impacts resulting from this policy will be positive on the health, safety and quality of life of all the protected groups. |
| | Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups? | Yes | |
| b | Has the assessment sufficiently considered the three aims of the Public Sector Equality Duty (PSED) and OTH objectives? | Yes | This proposal will promote the health, safety and quality of life of the residents and visitors, regardless of their background and promote cohesion of the borough. |
| 4 | Mitigation and Improvement Action Plan | | |
| a | Is there an agreed action plan? | NA | |
| b | Are all actions SMART (Specific, Measurable, Achievable, Relevant and Time Bounded) | NA | |
| c | Are the outcomes clear? | NA | |
| d | Have alternative options been explored | NA | |
| 6 | Quality Assurance and Monitoring | | |
| a | Are there arrangements in place to review or audit the implementation of the proposal? | Yes | |
| b | Is it clear how the progress will be monitored to track impact across the protected characteristics?? | Yes | The service and the partners including the police and NHS will continue collecting the data and monitor the impact of the policy. |
| 7 | Reporting Outcomes and Action Plan | | |

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| a | Does the executive summary contain sufficient information on the key findings arising from the assessment? | Yes | |
| 8 | Sign Off and Publication | | |
| a | Has the Lead Officer signed off the EA? Please note – completed and signed off EA and Quality Assurance checklists to be sent to the One Tower Hamlets team | Yes | |

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| Any other comments | | | |
| Signature | | Date | |

Please keep this document for your records and forward an electronic version to the One Tower Hamlets Team