

Equality Analysis (EA)

Financial Year
2015/16

See Appendix
A

Current decision
rating



Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose

(Please note – for the purpose of this doc, 'proposal' refers to a policy, function, strategy or project)

Pest Control - Bedbug treatment

It is proposed that the charge for the bedbug treatment in a family home will be increased from £94 (excluding VAT) to £141 (excluding VAT) for two visits. The current charge assumes that the service makes one visit to eradicate the problem. However, the service increasingly needs to return to sites where the problem persists after the first treatment, because the bedbug infestation has been heavier and more persistent in the borough due to the increase of bedbugs' insecticide resistance. In practice, the service has often provided the second visit free of charge, due to difficulty in predicting the severity of the infestation prior to the treatment and charging accordingly. This change of the charge will reflect the actual service needs and costs to complete the treatment in a household.

Conclusion - To be completed at the end of the Equality Analysis process

(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)

Name: Andrew Weaver
(signed off by)

Date signed off: 17 Dec 2014
(approved)

Service area:
Safer Communities

Team name:
Environmental Health and Environmental Protection

Service manager:
Andrew Weaver

Name and role of the officer completing the EA:
Andrew Weaver, Head of Environmental Health and Environmental Protection

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The following has informed the proposal:

- The current service charges and concessions
- The number of the pest control service take-up (all pest treatment; this year to date, 2013-14 and 2012-13)
- Benchmark data of the bedbugs treatment charge of London boroughs in 2013 (Appendix 1). The London average in 2013 was £169 including Vat. Our current charge is £112.80 (including Vat).
- Equalities data collected through the customer satisfaction survey.

The service currently offers the following pest control services:

Pest species	Current charge (including Vat)
Bedbugs in a family home	£112.80 per visit
Bedbugs in a Home in Multiple Occupation	Price on application by the landlord
Cockroaches	£112.80 for 3 visits
Fleas	£62.40 per visit
Mice	£112.80 for 3 visits
Pharaoh ants	£112.80 for 3 visits
Wasps	£62.40 per visit
Black (garden) ants	£62.40 per visit

The table below shows all treatments that the service provided since 2012/2013:

Treatments – all tenures, bedbugs only

2012-13	2013-14	2014-15 to date
1057	889	878

Although the service charges £112.80 per visit for a bedbug treatment in a family home, the service often returns to a site where the problem persists after the first treatment without charge. This is due to the difficulty in predicting whether a case requires an additional treatment prior to the start of the treatment and charging accordingly. The service has increasingly found more cases that require another treatment, because the bedbug infestation has been heavier and more persistent in the borough due to the increase of bedbugs' insecticide resistance.

A concession is currently offered to a range of residents and this arrangement will remain. The pest control service is provided free of charge to state pensioners. Both tenants and leaseholders of Tower Hamlets Homes will continue receiving the service free of charge based on a service level agreement with the service. The service will also continue to be free for tenants and leaseholders of the following Registered Social Landlords due to a service level agreement:

- Belgrave Street Housing Co-operative, odd numbers 13 to 49 Belgrave Street, E1
- East End Homes
- One Housing Group (Island region residents only)
- Providence Row Housing Association
- Spitalfields Housing Association

- Swan Housing Association.

Similarly, tenants of Poplar HARCA will receive the service free of charge. Their leaseholders will be charged for the service.

Although the current data reporting system does not collect detailed information on the service take-up, including a kind of pest and the payment status (full or concessions), the service acknowledges that the majority of the pest control customers have been benefitted by the concessions.

The actual estimated cost (excluding Vat) would be:

1.5 officers per visit make two 45min visits – officer charge per hour is £73.93. Therefore:

2 visits x ¾ hr x 1.5 officers x £73.93 per hour = £166.34 (bedbug treatment with two visits)

However, the service would like to keep the cost affordable for residents. So, £141 (excluding Vat; £169.20 including Vat) is proposed, in line with the London Councils' average.

This charge includes necessary materials.

Benchmarking data shows that the Council's current charges for bedbug treatment are within the lowest offered across London. In 2013, the average of the 22 London Boroughs' bedbug treatment charge was £169 (including Vat) and the one of Tower Hamlets was £110.40 (including Vat; £112.80 in 2014). The proposed increase to a charge of £169.20 inc Vat will locate the Council closer to the average of bedbug treatment charges across London.

Although the service collects equalities data of customers through the customer service satisfaction survey, the response rate has been very low. Since 2012, 36 responses have been collected, 5 of which were from the bedbug treatments. This does not provide conclusive evidence for us to analyse the impact of this proposal on different groups.

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available
(include information where appropriate from other directorates, Census 2001 etc)

- *Data trends – how does current practice ensure equality*

- **Equalities profile of staff?**

Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are

not directly employed by the council.

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? Eg- communication, access, locality etc.

- **Recent consultation exercises carried out?**

Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

Please Note -

Reports/stats/data can be added as Appendix

Target Groups	Impact – Positive or Adverse	Reason(s)
	What impact will the proposal have on specific groups of service users or staff?	<ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making Please also how the proposal will promote the three One Tower Hamlets objectives? <ul style="list-style-type: none"> -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership
Race	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Disability	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Gender	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Gender Reassignment	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Sexual Orientation	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Religion or Belief	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Age	Neutral	State pensioners will continue receiving the service free of charge. It remains unknown whether this group uses the service disproportionately more than any other groups.
Marriage and Civil Partnerships.	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly. It remains unknown whether this group uses the service disproportionately more than any other groups.
Pregnancy and	Neutral	This group will not be adversely affected by this proposal due to its characteristics directly or indirectly.

Maternity		It remains unknown whether this group uses the service disproportionately more than any other groups.
Other Socio-economic Carers		

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

No

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes

How will the monitoring systems further assess the impact on the equality target groups?

The service will continue monitoring the service take-up and equalities data of the customers. The service will also develop a method for increasing the participation in the customer satisfaction survey.

Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes

If there are gaps in information or areas for further improvement, please list them below:

As above, the customers' participation in the survey is low.

How will the results of this Equality Analysis feed into the performance planning process?

The service will develop a method for increasing the participation in the customer satisfaction survey.

Section 6 - Action Plan




*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.*

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Example				
1. Better collection of feedback, consultation and data sources	1. Create and use feedback forms. Consult other providers and experts	1. Forms ready for January 2010 Start consultations Jan 2010	1.NR & PB	
2. Non-discriminatory behaviour	2. Regular awareness at staff meetings. Train staff in specialist courses	2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	2. NR	

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
More customers' participation in the customer satisfaction survey	TBA	Actions to be agreed by 31-3-15	Jane Gardner-Hayter	

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 