



Equality Impact Assessment Record Form 2012-16

This form is to be used for recording the Equality Impact Assessment (EIA) of Council activities. It should be used in conjunction with the guidance on carrying out EIA in **Annex 2** of the Equality Scheme. The activities that may be subject to EIA are set out in the guidance.

EIA is particularly important in supporting the Council to make fair decisions. The Public Sector Equality Duty requires the Council to have regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations.

Using this form will help Council officers to carry out EIA in an effective and transparent way and provide decision-makers with full information on the potential impact of their decisions. The purpose is to avoid inadvertent disadvantage or discrimination resulting from decisions.

EIA is not a fixed process – it will vary according to the scale and type of activity. The form and guidance are designed to cover all eventualities. Officers should not be discouraged by the form, but should use their discretion in using it flexibly according to the activity they are assessing.

EIA does not happen at a single point in time. It is an ongoing and integral part of the development of the activity or proposal. This EIA template should be kept open and live as a planning document, and updated as the activity or proposal progresses.

Section 1 – Service Details and Summary of EIA Activity

Title of activity:	The transfer of Blue Badges from Central House Social Services to the Customer Service Centre at Town Hall
Lead Officer responsible for this EIA:	David Alley – Customer Services Manager
Telephone:	07753 771509
Service Group:	Resources
Service or Team:	Customer Services
Assistant Director accountable for this EIA	Cath Whitehead
Who else will be involved in carrying out the EIA:	

What stage has the EIA reached?

This table provides a 'cover note' of progress to be maintained as the EIA is developed over time.

Stage categories 1-3 listed below refer to the funnel model. Note the stage reached and any consultation or engagement carried out. Simple activities may not need all these stages. Provide details of population/individuals affected in Section 2

Stage	Date	Summary of position
Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified		<i>Whole population</i>
Stage 2: Further Assessment. Target Population likely to be affected identified		<i>All disabled Blue Badge holders and new applicants</i>
Stage 3: Further Assessment. Individuals likely to be affected identified		<i>MacMillan and other support organisations</i>
Stage 4: Analysis of Findings		On the whole, the move to transfer the provision of Blue Badges from Central House Social Services to Town Hall Customer Services will result in a more streamlined, quicker, and cheaper service for the end user. We will complete everything for the applicant, from the application/renewal form to the taking of their photograph.
Stage 5: Sign-Off		

Stage 6: Reporting and Action Planning		
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Section 2 – The Activity and Supporting Information

Details of the activity (including the main purpose and aims)

This is a proposal to move the provision of the Blue Badge enquiry and application service from Central House Social Services with support from Reception to the Customer Service Centre at Town Hall. The move is required due to resource not being available at Central House. The strategy is to make the process paperless and more streamlined for both client and the Council by utilising Customer Service systems and technology. At the moment the following steps are completed:

- Customer calls to apply. The call is manually transferred by Central House Switchboard.
- A paper application is posted out.
- Customer returns form. Application is scored using paper based matrix.
- Outcomes are: **Accepted, Declined, Refer to Occupational Therapy.**
- Letter sent to customer advising of outcome. End of process for **Decline.**
- If **Accepted**, customer needs to arrange for passport quality photos at their expense and attend Central House reception with proof of ID and qualifying Benefits
- Customer attends. £10 payment taken, cash only.
- Original application form retrieved from filing cabinet. Photos attached and receipt number added
- Whole bundle sent for scanning. Agent notified when photo is scanned.
- Successful application re-keyed in to BBIS (this is the Central Blue Badge issuing system). Photo uploaded. Fulfilment request direct to customer.
- Carefirst system updated with Blue Badge number and expiry date generated in BBIS.
- Whole application filed.

By moving the service to the Customer Service Centre, the process would be:

- Customer calls to apply. The call is sent through Contact Centre software allowing the caller to route themselves. Basic pre-recorded information on Blue Badges given.
- We complete an electronic application through Lagan. Outcomes are: **Accepted, Declined, Refer to Occupational Therapy** as now.
- The customer is informed of the outcome over the phone. End of process for **Decline.**
- If accepted, we advise the customer to attend the Customer Service Centre with proof of ID and qualifying Benefits. We advise we will take the photo using our existing Bus Pass camera. 1st point of contact ends.
- Customer attends. £10 payment taken via cash, cheque or card. Photo taken and saved in shared drive.
- Successful application re-keyed in to BBIS (this is the Central Blue Badge issuing system). Photo uploaded. Fulfilment request direct to customer.

In addition, the production and posting of reminder letters for expiring badges would cease. This would give a cost saving in printing, posting and admin. The onus for ensuring badges are reapplied for in good time will fall to the end user.

All Blue Badge holders and new applicants will be affected by the change. In addition, support organisations such as MacMillan will be impacted.

Who will be affected by the activity?

See the guidance on carrying out equality impact assessment within the Equality Scheme 2012-16. Provide details of the groups and numbers of people affected below, updating the table as the EIA develops and the understanding of who will be affected emerges in more detail.

Whole population

6556 Blue Badge users as of 31/03/2012

Target population

Individuals

What data, research and other evidence or information is available which is relevant to the EIA?

Question		Answer	
Source: Extract from CareFirst for DfT (Department of Transport) Annual Return. Purpose: Audit requirement of Local Authorities in issuing Blue Badges		i. Issued between 1 April 2011 - 31 March 2012	ii. On issue at 31 March 2012
1a	Number of Blue Badges for those on higher rate of Disability Living Allowance (DLA)	562	1554
1b	Number of Blue Badges for those on War Pensioner's Mobility Supplement	4	15
1c	Number of Blue Badges for Tariffs 1-8 of Armed Forces and Reserve Forces Compensation scheme	0	0
1d	Number of Blue Badges for those who are registered blind	26	91
1e	Number of Blue Badges for motorists with very severe upper limb disabilities	2	6
1f	Number of Blue Badges for people who are unable or are virtually unable to walk	1801	4815
1g	Number of Blue Badges for children under the age of three who are dependent upon bulky medical equipment	1	4
1h	Total number of Blue Badges on issue to organisations	17	71
1i	Total number of valid Blue Badges	2413	6556
1j	Total number of organisations that hold Badges at 31 March 2012	-	35
		i. Total Applications	ii. Of which: New Applications
2a	Number of applications received in the period 1 April 2011 - 31 March 2012?	2181	630
2ai	How many applications were subject to further assessment?	1679	518
2bii	How many applications were successful at the first application?	2135	587
2biia	Do you have an appeals procedure in place?	Yes	Yes
2biii	How many Badges were issued following an appeal?	5	5

2c	How many Badges were not renewed because the applicant was no longer eligible?	15	-
2d	How many Badges were not renewed due to improper use?	0	-
2e	How many Badges were not renewed due to other reasons?	535	-
	(please specify) Badge Holder Died 302 Badge Lost 56 Badge No Longer Required 19 Badge Stolen 5 Moved out of Area 18 No reason given 135	-	-
2f	How many mobility assessments were conducted in the period 1 April 2011 – 31 March 2012?	1013	308
2fi	Do you use independent mobility assessments?	Yes	Yes
2ga	How many mobility assessments were conducted by the applicant's GP?	970	266
2gai	How many mobility assessments conducted by the applicant's GP resulted in the applicant receiving a Badge?	954	253
2gb	How many mobility assessments were conducted by an independent medical professional (i.e. a physiotherapist or occupational therapist)?	15	15
2gbi	How many medical assessments conducted by an independent medical professional (i.e. a physiotherapist or occupational therapist) resulted in the applicant receiving a Badge?	11	11
2h	How many decisions were made based on a desk-based assessment?	28	-
2hi	How many decisions based on a desk-based assessment resulted in the applicant receiving a Badge?	26	-
2i	Are the figures provided in this section (1) actual, (2) grossed or (3) a mix of both, using a sample survey for a period of less than 1 year?	1	-
3a	After Badges were issued or renewed, how many Badges were subsequently withdrawn due to misuse?	0	
3b	After Badges were issued or renewed, how many Badges were subsequently withdrawn because the Badge holder had ceased to be eligible?	0	
4a	Do you have a policy for prosecuting for abuse of the Blue Badge Scheme?	Yes	
4b	How many people were prosecuted for abuse of the Blue Badge scheme?	0	
4ci	How many of the prosecutions were targeted at the actual Badge holder (even if their Badge had expired by the time of prosecution)?		
4cii	How many of the prosecutions were targeted at a non-badge holder using another person's Badge		
4d	Any additional comments on the prosecution figures or general comments about abuse of the scheme	-	
5a	How many Badges were reported lost during the year?	55	
5b	If reported lost, do you require a Police lost property report number before you issue a replacement badge?	No	
5c	How many Badges were reported stolen during the year?	3	
5d	If reported stolen, do you require a Police crime reference number before you issue a replacement Badge?	Yes	

5e	How many replacement badges were issued during the year for lost/stolen badges?	57
6a	Have there been any major changes that might have affected this year's form?	No
6ai	If YES, please give details	-
6b	Do you have any comments on the data that you have supplied	-

Check: before proceeding to the officer assessment, have you obtained all the data and information that is currently available?

Section 3: Officer Assessment

Use this table to record your views on potential impact on Protected Characteristics. As the activity and the assessment develop your views may change – record them here. It is important to be searching and honest about this – many Council activities are planned to be of positive benefit to identified target groups but can often have the potential for inadvertent effects on other groups.

Protected Characteristics	Potential Impact Positive/Negative/ Not Applicable			Potential level of impact				Summary of Impact
Age			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Race			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Sex			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Gender Reassignment			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Disability (summary of detail on next page)	P	N						See detail on next page
Religion or belief			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Sexual Orientation			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Pregnancy or maternity			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.
Marriage/ Civil Partnership			NA	H	M	L	nil	This service will be available equally to all clients with this characteristic.

Section 3: Officer Assessment - continued

The Council must have due regard to disabled people's impairments when making decisions about 'activities'. This list is provided only as a starting point to assist officers with the assessment process. It is important to remember that people with similar impairments may in reality experience completely different impacts. Consider the potential impacts and summarise in the Disability section on the previous page. Officers should consider how the 'activity' may affect a disabled person.

Mobility Impairment	P			H				The Customer Service Centre at Town Hall has plenty of parking next door in the car park and a small number of covered spaces. It is fully accessible from here and is no further than disabled parking provided at Central House. There is a wheelchair at Reception which can be used by carers/companions. The Town Hall is very close to both buses and taxi ranks.
Visual impairment	P			H				Customer Services will complete the application/renewal on behalf of the client, meaning they don't need to seek help in filling out paper forms. We will also arrange for their photograph to be taken. Customer Services meets all DDA requirements on access and lighting
Hearing impairment			NA				nil	There will be no change where applicants apply online. Minicom services are available via the Dolphin Centre.
Learning Disability			NA				nil	Blue Badges are issued to those with mobility impairments and critical illness such as cancer. Customer Services will guide all applicants through the process, explaining key points as we go. Private interview booths are available on request.
Mental Health			NA				nil	Blue Badges are issued to those with mobility impairments and critical illness such as cancer.
Long Term Limiting Illness	P				M			All applications will be speeded up as we complete the initial application on the customer's first point of contact.
Multiple Impairments	P			H				Customer Services will guide applicants through the process, taking the information needed to process the application and giving information on next steps and timescales.

Other - Specify	P	N	NA	H	M	L	nil	Language Line available
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Cumulative Impacts

The officer responsible for this EIA should seek input from the Corporate Equalities Group on the potential for this activity to combine with other recent, current or proposed activities, both Council and in the external environment, to result in more severe impacts on people with Protected Characteristics through their cumulative effects. The Corporate Equalities Group will advise on the content for this section of the EIA.

Change activities

Potential cumulative impacts

Reception Rationalisation Project

An EIA on Reception Rationalisation has not yet occurred. But it is planned we will re-introduce a receptionist to guide all clients through the correct process on arrival. This will be of assistance to those who can not wait for long periods due to medical reasons. The centre will also be relit and specific wheelchair accessible booths will be built. This EIA will help shape requirements in this respect.

Section 4: Engagement Decision

The decision about who to engage with, and how and when to engage, is the key to effective EIA. Please see Annex 2 of the Equality Scheme for guidance on the engagement decision.

<p>Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?</p>	<p>Yes</p>
<p>If YES, proceed to the next section. If NO, briefly summarise below the reasons why you have reached this conclusion.</p>	
<p>There is not a group of people who will be disadvantaged over another, however the impact of removing the renewal letter needs further consultation. This is not proposed to happen immediately and further time to investigate this is needed. But it is important we move the application process as quickly as possible to an area where resource is available to fulfil it.</p>	

If you have come to the conclusion that engagement is not required, seek ratification from the Corporate Equalities Group through your service Equalities Co-ordinator.

If engagement is not required but the officer assessment has identified changes that should be made to the activity, please complete Sections 7 and 8. If not the assessment can be signed-off at Section 9.

Any reports to decision-makers during the development of the activity, for example feasibility or options appraisal reports, should include content on the latest thinking and findings of the EIA even though, like the activity, further development of the EIA may be required before final reporting.

The findings of the officer assessment should be included in any reports to decision-makers. These may be feasibility or options appraisal reports where the activity is at an early stage of development, but it is essential that any equality findings are taken into account in formal decisions at all stages of development of the activity.

Section 5 – Involvement and Engagement Planning

Has the assessment shown that the activity will treat any groups of people with Protected Characteristics differently from other people? Yes/No
Yes
Will the differential treatment advance equality for people with Protected Characteristics? Yes/No
Yes, it will enable them to access the service more effectively, speeding up their application and reducing the costs they currently cover themselves.
Will the differential treatment cause or increase disadvantage for people with Protected Characteristics? Yes/No
The removal of the renewal letter service may cause disadvantage due to an increase in parking fines

From the above, prepare a simple plan using the template overleaf for involving and engaging with the organisations, groups and individuals likely to be affected by the activity.

There may be several stages of involvement and engagement, particularly for more complex activities. Initially it may be possible to identify and engage only with stakeholder and representative organisations for the people with Protected Characteristics who may be affected. Further development of the activity may be required before the individuals who will be affected can be identified.

The Involvement and Engagement Plan should evolve accordingly, with new engagement proposals added as they are identified.

Involvement and Engagement Plan

Which organisations, groups and individuals do you need to involve or engage and how?

Date of plan entry	Organisation, Group or Individuals	Date of event or activity	Type of activity – venue, channels, method and staffing
Ongoing	Adult Social Care		Existing process analysis
Ongoing	Social Care Systems Team		Existing process analysis and DfT returns
01/11/12	Darlington Association on Disability	01/11/12	Consultation
08/11/12	DBC Parking Office	08/11/12	Consultation
15/11/12	MacMillan Welfare Rights Service	19/11/12	Consultation on how to manage applications on behalf of clients with cancer
15/11/12	Business Transformation Team	22/11/12	No EIA completed as yet for Reception Rationalisation but this work will inform it.
15/11/12	Lisa Holdsworth, David Plews and Mary Hall	15/11/12	EIA Panel

Engagement to identify impacts works best in face-to-face and small group settings

Section 6: Engagement Findings

	Date/summary of engagement carried out	Summary of impacts identified
Age		
Disability		<p>Darlington Association on Disability replied on 1st November 2012. They agree moving blue badge processing from Central House to Town Hall will be easier for customers. The only concern with locating it with customer services at Town Hall is the length of time people may have to wait to be seen as at Central House waiting time is not a problem that we are aware of.</p> <p>They are concerned about the impact on individuals of ceasing renewal reminders. The DfT Blue Badge Scheme Guidance for LA Feb 2012 Appendix H p.92 recommends a renewal reminder to be sent 3 months in advance of expiry date and to secure return of expired blue badge. Is it reasonable to expect individuals to remember when their badge is due to expire without a reminder? I think this needs further exploration with an impact assessment. It could lead to an increase in parking tickets and complaints.</p> <p>Please see attached action plan.</p>
Mobility Impairment		
Visual impairment		
Hearing impairment		
Learning Disability		
Mental Health		
Long Term Limiting Illness		
Multiple Impairments		
Other - Specify		
Race		

Sex		
Gender Reassignment		
Religion or belief		
Sexual Orientation		
Pregnancy or maternity		
Marriage / Civil Partnership		

Section 6: Engagement Findings – Continued

Drawing on the engagement findings and your understanding of the effects of the activity, indicate how it will contribute, if at all, to the three strands of the Public Sector Equality Duty.

a) How will the proposal help to eliminate discrimination, harassment and victimisation?
The proposal continues with the vigorous framework for Blue Badge applications. Any condition which is not a clear-cut accept or decline will be referred to Occupational Therapy for an Independent Mobility Assessment.
b) How will the proposal help to advance equality of opportunity?
The application process will be the same for everyone.
c) How will the proposal help to foster good relations?
The process is transparent and has clear points of appeal.

During the engagement process were there any suggestions on how to avoid, minimise or mitigate any negative impacts? If so, please give details.

This completes the assessment, but there will be further work to do to contribute to the reporting and implementation stages of the activity. First though, it is important to draw a line under the assessment to maintain a separation between assessment of impacts and any proposals to manage those impacts. The assessment should therefore be signed-off at this stage.

Section 7 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	Name:	David Alley
	Date:	12 th November 2012
	Job Title:	Customer Services Manager
Assistant Director:		
Signed	Name:	
	Date:	
	Service:	

Section 8 – Reporting of Findings and Recommendations to Decision Makers

The findings of the EIA may be reported to decision-makers at several stages during the development of an activity. For example, the initial officer assessment findings may be included in a feasibility report or options appraisal to be considered by the Transformation Board or Chief Officers' Executive.

Any report for formal decisions by Cabinet or Council should include the latest findings of the EIA, even if these are at a relatively early stage. The report recommending final approval of the activity should await and include the findings of the completed EIA. The report should present clearly the impacts that have been identified through the engagement process, including potential cumulative impacts.

The report may include recommendations based on the findings of the EIA, but these should be separate from the reporting of impacts. Recommendations will be developed separately from the EIA and arise from considering equalities impacts combined with other aspects of the activity such as finance, the benefits of the activity, and so on.

Based on the EIA findings, the report may consider the options in the table below, but the report must contain a clear statement of the impacts so that decision-makers can understand the effects of the decision that is being recommended.

What does the review of the information show?	
a)	No negative impact on people because of their Protected Characteristics - continue with the activity and monitor progress on implementation
b)	Negative impact identified – recommend continuing with the activity; clearly specify the people affected and the impacts, and providing reasons and supporting evidence for the decision to continue
c)	Negative impact identified - adjust the activity in light of the identified impact to avoid, minimise or mitigate the impact
d)	Negative impact identified - stop activity and provide an explanation why

Section 9 – Action Plan and Performance Management

The report to decision-makers, and the decision made may require actions to be taken to avoid, minimise or mitigate the negative impacts of the activity. Option C in the table in Section 8, combined with mitigation measures that may have been highlighted during engagement and listed in Section 6 (if adopted) will require action planning to implement them.

Any actions to address equalities impacts should be listed below, with performance management review proposals, to complete the full EIA.

What is the negative impact?	Actions required to reduce/eliminate the negative impact (if applicable)	Who will lead on action	Target completion date
Concern over Waiting Times at the Customer Service Centre in peak times	<ul style="list-style-type: none"> Ensuring Blue Badge Clients are advised of the Customer Service Centre's quietest times to attend. 	David Alley	01/12/12
Concern over those with severe impairments or in severe pain having to wait in line. There is no receptionist in the Customer Service Centre	<ul style="list-style-type: none"> Where we notice a vulnerable customer attending, eg: oxygen dependent, to go out and enquire whether they need additional assistance. Anyone who specifies this risk over the phone may be made a pre-arranged appointment 	David Alley	01/12/12
Concern over the removal of the renewal letter provision	<ul style="list-style-type: none"> Liaise with the Parking office to see if we can introduce a way of notifying motorists their badge is expiring by placing a notice on the car. Introduce a grace period where motorists are warned rather than fined for parking with an expired Blue Badge, or investigate a more lenient appeals criteria where we agree the client would have met the criteria for a Blue Badge had they renewed in good time. Devise a communication plan to include media, doctors, hospitals and parking wardens. This won't be removed immediately on 	David Alley	01/12/12

	transfer to Customer Service		
Concern over the availability of Disabled Parking, and the fact that existing badges have to be presented at Customer Services, meaning they're not left on display in the vehicle.	<ul style="list-style-type: none"> Investigate the provision of "drop-in" bays in the Town Hall Car Park where Blue Badge holders can park without displaying their badge 	David Alley	01/12/12
Concern over transporting the infirm from the car to the Customer Service Centre.	<ul style="list-style-type: none"> Investigate the provision of a wheel chair for carers to transport those with severe disabilities from the car park to the Customer Service Centre 	David Alley	01/12/12

Performance Management	
Date of the next review of the EIA	01/12/12
How often will the EIA action plan be reviewed?	Ongoing in the first months, then as and when issues arise, then 6 monthly.
Who will carry out this review?	David Alley

