

EQUALITY IMPACT ASSESSMENT

1. Topic of assessment

EIA title:	Buckinghamshire County Council and Surrey County Council Trading Standards Joint Service Project
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EIA author:	(To end of July 2014): Ian Dewar, Policy Manager, Customers and Communities, Surrey County Council. (August onwards): Gina Green, Buckinghamshire Trading Standards
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2. Approval

	Name	Date approved
Approved by¹		

3. Quality control

Version number	V1.3	EIA completed	
Date saved	30 July 2014	EIA published	

4. EIA team

Name	Job title (if applicable)	Organisation	Role
Ian Dewar	Policy Manager	Surrey CC	Lead (to July)
Gina Green	Trading Standards Team Leader	BCC	Lead (post July)
Cathy Murphy	Trainee Project Manager	IESE	Research support

¹ Refer to earlier guidance for details on getting approval for your EIA.

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5. Explaining the matter being assessed

<p>What policy, function or service is being introduced or reviewed?</p>	<p>The Trading Standards Services from Surrey County Council and Buckinghamshire County Council are seeking to develop a landmark first “strategic alliance” through creating a Joint Trading Standards Service. The development of a Joint Service will allow a positive approach to meeting increasing financial pressures and the new consumer protection landscape, including greater national focus on cross border issues. The suggested way forward sits well with considering alternative delivery vehicles and being more commercially minded.</p> <p>The work of Trading Standards ensures that the goods, services and food bought by residents is safe and meets minimum legal standards. The service ensures descriptions and claims made are not deceptive or misleading. In doing this, TS protects everyone, makes communities safer, improves health and supports the local economy by protecting legitimate businesses and local residents from unfair trading practices. In carrying out its role, and planning activities Trading Standards is intelligence-led, relying on robust information to target activity where it will achieve the greatest results.</p> <p>The full set of project documentation is under development and the key timeline dates for the project are:</p> <table data-bbox="448 1108 1442 1512"> <tr> <td>Dec-Jan 2014</td> <td>Project Scoping</td> </tr> <tr> <td>Feb 2014</td> <td>Project Launch</td> </tr> <tr> <td>Mar 2014</td> <td>Project Governance Established</td> </tr> <tr> <td>Apr-May 2014</td> <td>Data Gathering and initial Engagement</td> </tr> <tr> <td>Jun 2014</td> <td>Business Case and Plans Drafted</td> </tr> <tr> <td>Jul 2014</td> <td>Agreement in Principle BCC / SCC</td> </tr> <tr> <td>Aug-Mar 2015</td> <td>Project Initiation & Delivery</td> </tr> <tr> <td>Oct 2014</td> <td>Cabinet approval to progress</td> </tr> <tr> <td>Feb 2015</td> <td>Technical acceptance testing</td> </tr> <tr> <td>Apr 2015</td> <td>Full Launch of Joint Service</td> </tr> <tr> <td>Apr-Oct 2015</td> <td>Benefits Monitoring and Project Closure</td> </tr> </table> <p>(The full Project Plan is available from ggreen@buckscc.gov.uk)</p>	Dec-Jan 2014	Project Scoping	Feb 2014	Project Launch	Mar 2014	Project Governance Established	Apr-May 2014	Data Gathering and initial Engagement	Jun 2014	Business Case and Plans Drafted	Jul 2014	Agreement in Principle BCC / SCC	Aug-Mar 2015	Project Initiation & Delivery	Oct 2014	Cabinet approval to progress	Feb 2015	Technical acceptance testing	Apr 2015	Full Launch of Joint Service	Apr-Oct 2015	Benefits Monitoring and Project Closure
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<p>What proposals are you assessing?</p>	<p>The proposal under assessment is the establishment of the joint service. The aims of this initiative are principally to:</p> <ul data-bbox="507 1697 1442 2033" style="list-style-type: none"> • Share expertise and best practice, enhancing the resilience and robustness of the service • Maximising benefits by building on successes and innovation • Reducing costs through operating jointly, sharing resources and eliminating duplication • Establishing a larger national and regional profile, whilst maintaining local presence and accessibility • Enhancing key services • Creating a sustainable model that allows further developments 																						

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	<p>The principal aspects of the development of the joint service that require EIA consideration include:</p> <ul style="list-style-type: none"> • Establishing the potential impact to staff terms and conditions (and benefits), in relation to any TUPE transfer arrangements and the impact of the TUPE process itself. • Sharing of IT systems, data and associated governance processes, including DPA considerations • Communications and media, both internal and external • Financial and planning frameworks, including compliance with transparency, scrutiny and political governance processes • Accessibility and range of services provided to businesses, partners and consumers • Resourcing and service priorities in relation to vulnerable people and other protected characteristics
<p>Who is affected by the proposals outlined above?</p>	<p>Public and other stakeholders:</p> <p>There is no expectation that the development of the joint service will have any negative impact on the public facing service in either county. In particular there is no evidence at this point that there is an equalities impact to any of the protected characteristics. Rather, the potential to share and extend the range of activity, and the expected greater financial resilience arising from the initiative are more likely to yield a positive enhancement and greater protection of services from financial pressures. Both authorities prioritise support and protection activities to vulnerable people and this will remain a primary focus for the joint service.</p> <p>There is well established evidence that enhanced support to people, especially those who are vulnerable, enhances their quality of life and reduces the likelihood of their becoming more dependent upon secondary and tertiary support services. A key element in this is the sense of security delivered by improved community safety, of which Trading Standards activity is a key element. The sharing of expertise and improved service availability that the joint service will deliver, will enhance this impact in both authorities. This will deliver both personal and community benefits and, as a result, have a positive impact on the private and public economies.</p> <p>Staff:</p> <p>Existing staff will be affected to varying degrees by the proposals, primarily as a result of:</p> <ul style="list-style-type: none"> • TUPE of staff from BCC to SCC (expected) • Some potential changes arising from convergence of terms, conditions and benefits • Developing a common policy towards career progression • Some recasting of individual roles and responsibilities to reflect the new joint service management and delivery need • Changes in processes and systems, requiring training and

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	<p style="text-align: center;">operational adjustments</p> <p>All aspects of the staff processes will be managed with full HR support and backed up with extensive consultative and communication activity. In many ways the joint service will be expected to bring positive benefits as a result of greater opportunities within a larger and more secure and prestigious service.</p>
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6. Sources of information

Engagement carried out
<p>Regular communication and engagement has been undertaken with staff throughout the process, including:</p> <ul style="list-style-type: none"> • Update briefing and progress e-mails to Trading Standards staff in both authorities • Discussion and internal staff meetings, leading to the development of FAQs • Briefings at internal whole team meetings, delivered by senior managers from both authorities • Joint staff conferences, held on 7 May and 16 July 2014, with further dates planned for September and later in the year • Establishment of a shared space on the Trading Standards South East Ltd (TSSEL) website, with passcode access enabled for all staff, providing key documents, dates and chat / discussion streams • Open invitation to all staff to contact the project management team or individual managers with queries or comments <p>Staff have also had the opportunity to become actively involved in the working groups developing specific strands of the project. There are currently seven of these, each with lead and membership drawn from both authorities' staff</p> <p>Members have been kept informed through:</p> <ul style="list-style-type: none"> • Regular briefings between Portfolio Holders and Heads of Service • Establishment of a Project Board including Portfolio Holders and Strategic Directors from both authorities • Briefing and information sessions for informal Cabinet / Corporate Leadership meetings in both authorities, with dates set for Select Committee (July) and Cabinet agendas (October) <p>Public and partner engagement has been informal and limited to date but a newly convened working group will be developing and delivering a programme of internal and external Communications to raise the profile of the project and the joint service itself</p>
Data used
<p>Detailed service data is being collated and analysed by the working groups as part of the work to develop options and define the Target Operating Model for the joint service. As the detailed models for implementation develop over the project, evidence and proposals will be assessed for their potential equalities impact and, where appropriate, further EIAs may be undertaken. It is expected that this is only likely to occur in relation to staff terms and conditions (and benefits), including TUPE.</p>

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The data included here provides a breakdown on the existing staffing of the two existing services, and also an overview of the census data for the two counties.

1. Staff numbers and characteristics

		BCC	SCC
No. of staff:		25	50
Gender	F	57.7%	61.1%
	M	42.3%	38.9%
AGE:	20-30	7.7%	9.3%
	30-40	30.8%	20.4%
	40-50	26.9%	33.4%
	50-60	30.8%	35.2%
	60-70	3.8%	1.9%
Work pattern	F/T	69.2%	88.0%
	P/T	30.8%	12.0%
Race / Religion / Sex / Sexuality / Gender reassignment / Marital status/ Civil partnerships / Maternity & Pregnancy		Zero*	Zero*

Commentary:

In line with other aspects of the two services, the proportion of staff is roughly 2:1 between SCC and BCC. The two staff groups are broadly very similar, with more female than male employees, though the SCC staff has a slightly older demographic (67% aged 40-60 compared to 57% in BCC).

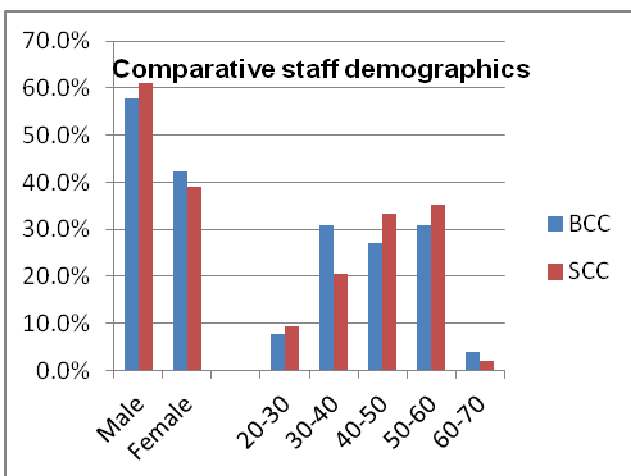
There is a higher proportion of full time staff (88%) within SCC than in BCC (69%).

Other data is not displayed (See note below the table). In some cases this is because it is not routinely collected but primarily, with such small populations, the convention is not to show very small numbers / proportions. For each of the se categories the numbers in minority categories are very small and individual needs arising will be considered fully.

In summary, the data suggests that any changes that may impact on staff will need to be specifically responsive to the needs of three groups:

- Those currently in part time roles, where the terms and conditions may affect working patterns or base of operations
- The needs of the small minority of staff who have a disability
- The individual needs of the small minority of staff from BME ethnic groups

*Data indicated as Zero is either not routinely collected or, In line with DPA principals would yield values of 10 or less and therefore carry an enhanced risk of identification by association



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2. Wider county demographics

		BCC	SCC
Gender	F	50.1%	51.0%
	M	49.9%	49.0%
Age	0-10	13.7%	12.1%
	11-19	11.4%	11.9%
	20-39	23.2%	24.4%
	40-59	28.9%	28.2%
	60-74	15.0%	14.7%
	75-84	5.6%	5.9%
	85+	2.2%	2.6%
Percentage change 2001 - 2011	0-10	0.5%	6.78%
	11-19	5.9%	8.15%
	20-39	-7.8%	-4.22%
	40-59	7.7%	9.04%
	60-74	24.0%	20.01%
	75-84	22.5%	10.45%
	85+	26.3%	25.52%
	Overall	5.5%	6.94%
Ethnicity	White	86.4%	90.4%
	Non-white	13.6%	9.6%
Other significant factors:			
	% Pensioners living alone	11.8%	14.3%
	% Population economically active	73.6%	73.6%
	economically inactive	26.4%	26.4%
	Long term sick / disabled	2.0%	2.1%
	Long term limiting illness	13.4%	13.5%
	Bad / very bad health	3.5%	3.5%
	Unemployed	3.0%	2.8%

Commentary:

This data, drawn from the 2011 census, shows that there is a considerable similarity between the two counties.

The variations with the most potential significance identified here are:

- The non-white proportion of the population in Bucks is 14% compared to 10% in Surrey
- The % of pensioners living alone is higher in Surrey (14%) compared to Bucks (12%)

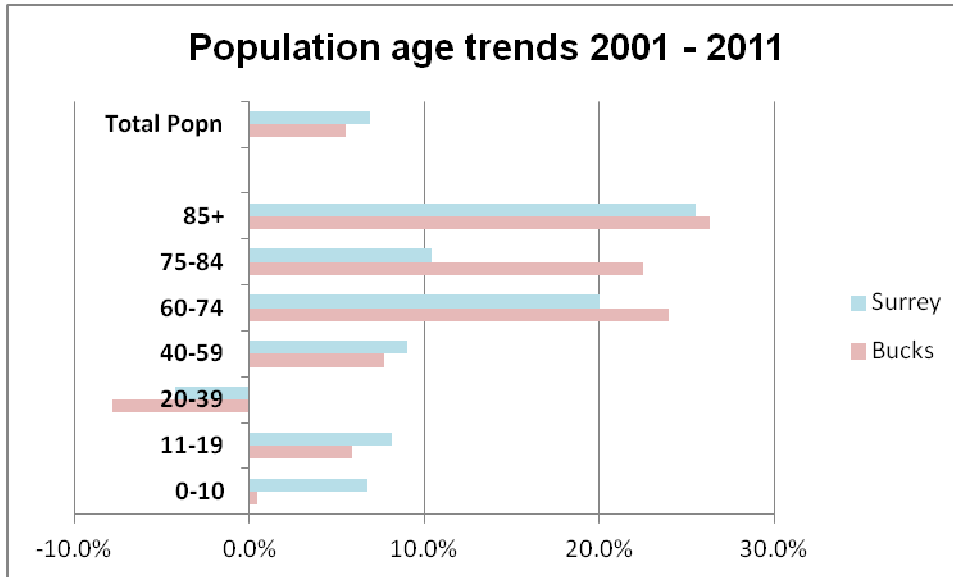
Both of these groups are likely to be prominent in those identified as vulnerable to predatory or exploitative trading practices and each of the services has developed responses to the needs of these people and communities which should identify shared best practice within the joint arrangements.

The other significant factor is the indication of population growth between 2001 and 2011, which is significantly different for key age demographics between the two counties. (see below)

Since both existing services are intelligence-led and responsive to the needs of their local populations the data does not suggest that there will be any new issues anticipated from the establishment of a joint service.

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Population change 2001-2011



In terms of planning for the future shape of a service, the trend in population growth demonstrated between census figures provides a strong indication of future demand. The data for Bucks and Surrey, as illustrated in the above graph shows significant variations:

Both populations have grown, with Surrey's population growing at a faster rate (7% compared to 6% in Bucks). The growth in under-10 year olds is particularly different with a 7% increase in Surrey compared to less than 1% in Bucks. Combined with the figures for the teenage years, this indicates that there is a considerably faster growth in young families, in Surrey than in Bucks.

Both populations show a marked decline in the 20-40 age group (Down 4% in Surrey and 7% in Bucks), though these still represent around a quarter of the population overall.

Increases in the number of older people reflect the perception of an ageing demographic that characteristics most of the Shire Counties, but the rate of growth in Bucks, particularly for the 75-84 age group is markedly faster than in Surrey (+23% compared to +11%). In both counties the over 60s account for just under a quarter of the population but this will contrast more starkly in Bucks than in Surrey with the situation ten years before.

The aging population is linked to improved health care and personal lifestyles, but there is also an established and increase demand on social and health services as a result of those who are more socially isolated or in poorer health. The data shows that between 11 and 14% of over 65s are living alone and these people are recognised as being among the most vulnerable.

The population trends suggest that the growths in young families, and vulnerable older people, and the enhanced service demands that they represent is likely to increase and needs to be factored into the new service design.

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7a. Impact of the proposals on residents and service users with protected characteristics

Protected characteristic ²	Potential positive impacts	Potential negative impacts	Evidence
Age			<p>The development of the joint service is expected to have no negative impact on consumers or businesses and, more specifically, will be impact neutral in relation to those people within the two counties who have one or more of the Protected Characteristics. The demography of the two counties (See Page 9, above) is very similar and both authorities have developed services that are responsive to the needs of their populations. These will continue to be delivered and, may be enhanced for vulnerable people, who are prioritised.</p> <p>The analysis of the population growth trends on page 10, above, indicates that there is significant growth in two key age groups – the under 10s (more noticeably in Surrey), and the over 60s, particularly the over 70s (increasing more rapidly in Bucks). Both of these age groups create specific demands upon Trading Standards services, particularly in terms of protection from faulty and dangerous goods, under-age sales and protection from rogue trading.</p> <p>The aim of the joint service development is to ensure that the local impact and effectiveness of Trading Standards is maintained and, where efficiencies and the widening of specialist service availability allows, services are expected to be enhanced.</p> <p>People recognised as being more vulnerable to predatory or exploitative business practices, which may include older people, those with disabilities, and people from other ethnic backgrounds, will continue to be regarded as a priority and the sharing of experience between the two services is expected to extend best practice and improve service across the new joint arrangement.</p> <p>Development working groups are actively working on strands of the Target Operating Model for the new service. Among these are the Working Practices and Business Planning groups that will be identifying the operational and policy frameworks for the new service. As this work progresses additional information will be assessed for Equalities consideration and any operational frameworks will be tested for potential impact on the protected characteristic groups. If deemed necessary a secondary EIA may be required</p>
Disability			
Gender reassignment			
Pregnancy and maternity			
Race			
Religion and belief			
Sex			
Sexual orientation			
Marriage and civil partnerships			

² More information on the definitions of these groups can be found [here](#).

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7b. Impact of the proposals on staff with protected characteristics

The analysis of staff demographics is set out on page 8. On the basis of this evidence there is no expectation of any negative impacts on any of the existing staff arising from any Protected Characteristics. Any changes to Terms and Conditions, including Employer, working practices, roles and responsibilities, and job location will be subject to consultation, fully supported by HR and undertaken in compliance with approved policy and legislation. It is expected that a more detailed EIA will be undertaken once the staffing element of the joint service development commences the development and implementation phase.

Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence
Age	The age breakdown of the staff is largely within the normal working age range and only a small proportion are aged 60 or older. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles. A common approach to career progression (established in BCC but developing in SCC) may deliver positive impacts, especially for younger employees		See page 8, staff demographics, above. The proportion of staff aged 60 and above is 4% in BCC and 2% in SCC
Disability	Only a very small proportion of the staff are identified as having a disability. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles. There is no expectation that most staff will be expected to relocate or co-locate, but there may be an issue with parking at the BCC offices that will need to be addressed		See page 8, staff demographics, above. The proportion of staff identified as having a disability is 4% in SCC. No data available for BCC
Gender reassignment	No evidence of any potential impact		No data available
Pregnancy and maternity	Around a third of employees are under 40 and may therefore have young families or may become pregnant. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles.		See page 8, staff demographics, above. The staffs are both around 60% female and the proportion of employees aged 20-40 is between 30% (SCC) and 39% (BCC)

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Race	Only a very small proportion of the staff are from a BME ethnic background. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles.		See page 8, staff demographics, above. The proportion of staff from BME ethnic background is 4% in SCC. No data available for BCC
Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence
Religion and belief	No evidence of any potential impact		See page 8, staff demographics, above. There is no evidence of any religious or belief factors that need to be taken into account
Sexual orientation	No evidence of any potential impact		No data available
Sex	No evidence of any potential impact		See page 8, staff demographics, above. The majority of staff are female
Marriage and civil partnerships	No evidence of any potential impact		No data available

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8. Amendments to the proposals

Change	Reason for change
None identified at this stage but equalities considerations will be factored into further development and planning and further EIAs undertaken where deemed appropriate	

9. Action plan

Potential impact (positive or negative)	Action needed to maximise positive impact or mitigate negative impact	By when	Owner
Potential for positive and negative impact on staff arising from changes to conditions of employment in establishing the joint service	<p>All activity conducted with HR support and in line with policy and legislative frameworks</p> <p>Full and open communication throughout with all staff</p> <p>More detailed EIA to be undertaken as the detailed arrangements are developed and implemented</p>	TBC but will reflect project and statutory timelines	Project Sponsors, supported by HR from BCC and SCC
No other specific actions identified at this stage but all developing elements of the Target Operating Model and implementation of the joint service will be assessed for equalities implications and other specific EIAs may be developed as identified			

10. Potential negative impacts that cannot be mitigated

Potential negative impact	Protected characteristic(s) that could be affected
None identified – the project is expected to be impact-neutral	

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11. Summary of key impacts and actions

Information and engagement underpinning equalities analysis	Open and diverse staff communications throughout
Key impacts (positive and/or negative) on people with protected characteristics	None identified, though further developments and data will be assessed and additional EIAs undertaken if deemed appropriate
Changes you have made to the proposal as a result of the EIA	None identified at this stage
Key mitigating actions planned to address any outstanding negative impacts	EIA to support the detailed development of changes to staff conditions of employment
Potential negative impacts that cannot be mitigated	None identified at this stage