

Agenda Item No: 7

Report To: Cabinet

Date: 9 June 2016

Report Title: Fixed Penalty Notice Enforcement for Littering and Dog Fouling

Report Author: Tracey Butler, Environmental Contracts and Operations Manager

Portfolio Holder: Councillor Clair Bell, Portfolio Holder for Public Interaction and Borough Presentation
Councillor Graham Galpin, Portfolio Holder for Town Centres Focus and Business Dynamics



Summary: This report provides information on the recommended utilisation of a private company, for a trial litter enforcement initiative, for a period of 1 year. If the trial proves successful the council will look to procuring a contracted service going forward.

Key Decision: YES

Affected Wards: All wards in Ashford (initially Town Centre's focussed)

Recommendations: **The Cabinet be asked to:-**

- I. Approve the development of this enforcement initiative for the trial period of 1 year
- II. Approve the littering and dog fouling enforcement policy at Appendix 2
- III. Approve that the Head of Environmental and Customer Services and the Portfolio Holder for Public Interaction and Borough Presentation, be tasked to procure a contract for the service long term

Policy Overview: The Clean Neighbourhoods and Environment Act 2005, gives local authorities the power to serve Fixed Penalty Notices for the offence of littering.

In 2014, Ashford Borough Council began a public awareness and education campaign using the character "Sir Litternot". Public engagement has been extensive, across a wide range of media. In pursuit of Corporate Priority 4, Attractive Ashford, we now plan to move to the enforcement stage of this work. Using the principle that the "perpetrator pays", we intend to engage a company, to work on our behalf for a 12 month trial, to serve Fixed Penalty Notices for littering and dog fouling.

Financial Implications: This pilot is designed to be a cost neutral solution to litter enforcement. At approximately 58% payment rate of Fixed Penalty Notices, the service should break even. There is a financial risk to the authority should this payment rate not be achieved and further details of this appear within the report.

Risk Assessment See below

Equalities Impact Assessment YES, attached as Appendix 3

Other Material Implications: N/A

Exemption Clauses: N/A

Background Papers: N/A

Contacts: Tracey.butler@ashford.gov.uk@ashford.gov.uk
Tel: (01233) 330875

Report Title: Fixed Penalty Notice Enforcement for Littering and Dog Fouling

Purpose of the Report

1. To provide information on the recommended provision of littering enforcement in Ashford and Tenterden town centres

Background

2. This report provides a litter and dog fouling enforcement policy (Appendix 2), consistent with the Council's Enforcement Policy, agreed at the Cabinet in May 2016 (minute reference 430/05/16 refers) .
3. The House of Commons Briefing Paper on Litter (12 February 2016), stated that in 2012/13, the total amount of litter tackled by English Local Authorities was in excess of 30 million tonnes.
4. Direct costs of littering are borne by the principal litter authorities (including Ashford Borough Council), who are responsible for clearing up litter and enforcing the law. Keep Britain Tidy estimate this cost (as part of the cost of street cleansing in 2013/14) to be £717m annually.
5. Indirect costs of littering are difficult to quantify but are listed in the House of Commons Briefing Paper as;
"health costs associated with infections from contaminated litter, accidents caused by litter, environmental damage, injuries to wildlife, and loss of tourism. There is also some evidence of a correlation between litter and crime."
6. Litter enforcement in Ashford began with an awareness and education campaign in 2014, spearheaded by the character "Sir Litternot" (see appendix 1). This included community events at fun days such as Moat fun day on Stanhope, Create music festival and public engagement days at County Square shopping centre in Ashford. Events for younger residents also ran in Ashford library and through competitions on Ashford Borough Council's website.
7. The awareness and education campaign has been lengthy and extensive and the time has now come to step into the realms of enforcement for littering, to support Priority 4 of the corporate plan, Attractive Ashford.
8. The progression of the enforcement campaign will work in partnership with our contractor Biffa, who are reorganising the cleansing regime in the town centre (Ashford). This is in order to ensure a presence of cleansing operatives in the town centre for 11 hours of the day, centred on the majority of store opening hours.
9. We are also working with the Regeneration Manager (Town Centre) and her team on the "Healthy High Streets" project, under the heading "Pride". This will consider the provision of cigarette butt bins for premises to service

themselves and working on voluntary code of practice for reducing littering from premises that provide “food on the go”.

10. The contractor will be utilised to provide officers to directly address the issue of street litter and dog fouling issues. The utilisation of the contractor for this trial enforcement initiative will provide the most efficient solution to tackling littering in a robust manner

Efficient Enforcement

11. The Clean Neighbourhoods and Environment Act 2005 gave the Council power to utilise fixed penalty notices (FPNs) for litter offences.
12. Since the introduction of the 2005 Act the availability of in house resources has reduced. With the introduction of the current waste and recycling contract, staff in the street scene team were reduced considerably (approximately halved) to reflect the fact that the Council now have an output based contract for refuse and recycling and street cleansing, designed to be largely self-monitoring by the contractor.
13. The current external street scene staff are focused on ensuring the contractor meets its responsibilities under the terms of the contract. The Canine Officer supports this function as well as undertaking targeted dog fouling patrols, dealing with the new responsibilities under the new micro chipping regulations (which came into force in April 2016) and the collection of stray dogs.
14. An in house alternate option considered was the use of our Civil Enforcement Officers (CEOs) (who serve Penalty Charge Notices (PCNs) on parked cars). However, the skill set for serving PCNs on an empty car and serving Fixed Penalty Notices on an individual are very different and would detract considerably from the function of CEOs which is road safety and maintaining the free flow of traffic.
15. Consequently, it is likely we will never have the capacity in house, to provide a dedicated litter enforcement service if we are to continue with our other enforcement issues, parking and abandoned vehicles (HPCS) and contract management (waste, recycling, street cleansing, pest control).
16. A contractor provides the opportunity to provide a highly visible and robust enforcement response to tackle the growing issue of littering, whilst maintaining service delivery in other areas of work.
17. The number of officers provided by the contractor is governed by the enforcement expectation of the authority. To support the new approach to litter it is anticipated 3 wardens will be provided, 2 in Ashford and 1 in Tenterden. This is likely to result in 40 - 80 fixed penalty notices being issued per week.
18. The officers provided by the contractor will wear a similar uniform to the Councils CEOs; carry Council identification badges and will be authorised as Council officers for the purpose of enforcement against littering. The contractors officers will be wearing overt “body-worn cameras” (to improve

payment rates and reduce appeals based on officer conduct) and either overt or covert stab vests (for officer safety and as part of the contractors own risk assessment). This is the norm across contracts of this nature.

19. The contractors officers will patrol the town centres, with a view to attending other heavy footfall areas of the borough as the service progresses. The officers are flexible in their approach and if areas are in need of additional enforcement due to specific problems or major events occurring the officers will respond to the requirements.
20. The council is not required to place signs in every street, road, highway, park or open space to tell people not to litter or to inform them that litter patrols are operating in the area.
21. Litter legislation has been in force for many years and littering in many parts of the UK is at such levels that councils across the country are now actively issuing Fixed Penalty Notices in order to drive the message home to those who spoil our towns and cities by carelessly discarding their rubbish. Prior to the introduction of Fixed Penalty Notices, a communications campaign will be undertaken to ensure our residents know about this in advance.
22. Recognising the administrative burden associated with issuing the fixed penalty notices, the contractor will also be required to provide the following support systems:
 - administrative resources to process fixed penalties (dependant on 12 month trial period);
 - handle all enquiries regarding the payment of fixed penalties or appeals received against the notices issued; and
 - Investigate and provide reports on all complaints made against their officers whilst acting on behalf of the council.
 - Collect funds for payment of FPNs
 - Provide enforcement files to our legal team where prosecution is required

A cost neutral solution

23. The Local Government Act 2003, Section 119 allows local authorities to keep the resources from fixed penalties issued against certain offences. The Act states that the monies collected should be utilised to provide additional spending to enhance the local environment.
24. To fund this initiative, the contractor will invoice the council £46.50 for each fixed penalty notice successfully issued by their officers. The fixed penalty notices issued for littering in Ashford are currently set at £75; therefore £28.50 of each fixed penalty issued by the contractor will come to the Council. (The enforcement and administration solution provided by the contractor is therefore funded directly from the receipts of fixed penalties successfully issued by their enforcement officers).
25. The national average for payment of Fixed Penalty Notices in 2006/07 was 77% with only 10% of non-paid penalties progressing to prosecution (DEFRA, 2010).

26. It is anticipated that the payment rate achieved by Kingdom for Ashford is likely to be between 70 and 75%. Those offenders who fail to pay their fixed penalty in the allotted time will be pursued through the courts for the original offence of littering. There will be no reduction in the FPN for early payment. (In law an early repayment is possible. However, a neighbouring authority that began their trial by allowing an early payment system had to over-turn this part way into the trial as it did not prove to be cost neutral to the authority.)
27. The contractor utilises many control measures to ensure the percentage of fixed penalties paid are high. In the field, the issuing officer has telephone access to a support system, which allows cross referencing of personal details to ensure that the fixed penalty is issued to the correct person.
28. As this is a trial, it is difficult to predict exact income figures. The contractor is not issuing officers with targets for FPNs, however, the following gives some indication of likely FPN issues. With a 3 man deployment and each officer issuing 4 FPN's a day (1 every 2 hours) it would mean 12 a day or 60 a week x 50 weeks a year is 3000 FPN's. Allowing for leave and unforeseen absence and 2 officers issuing 8 in total a day or 40 a week x 50 weeks, they would be issuing 2000 FPNs. It is therefore estimated that between 2000 and 3000 FPNs would be issued per annum, providing the footfall remains and the intelligence is good.
29. The number of fixed penalties issued will be closely monitored throughout the period, along with assessing how the service is operating on the ground.
30. It is proposed that any additional income generated by the initiative will be utilised to fund any additional costs to the authority and to support provision of additional equipment for education and enforcement campaigns. This is likely to include additional patrols for dog fouling, at the end of the pilot 12 month period, going into a full scale service (subject to satisfactory performance). In the meantime, the one "in-house" canine warden that we do have is regularly reviewing his dog fouling patrolling areas and targeting patrols based on complaints, whilst undertaking his other duties (micro-chipping and collecting strays).
31. Any enforcement activity is the final stage of promoting a cleaner borough and having a more visible presence will also have a wider impact on littering and other environmental crimes across the borough.
32. Whilst the service provided by the contractor will be designed to be cost neutral and measures put in place to prevent any costs to the authority, there is a risk that the payments received will be less than those invoiced by the contractor. Mitigation of this risk is provided in the section below.

Corporate Consultation Undertaken

Finance	<i>Exchequer Manager and Fraud Manager</i>
Communication	<i>Communications and Marketing Manager</i>
Customer Services	<i>Customer Services Manager</i>
I.T.	<i>Business Support Officer</i>
Procurement	<i>Procurement Officer</i>
Street Scene Enforcement	<i>Head of Environmental and Customer Services</i>
Legal	<i>Legal advisor and Principal Solicitor</i>
Corporate Property and Projects	Regeneration Manager (Town Centre)

Risk Assessment

33. Reputational; As an authority we have begun litter enforcement with our awareness and education plan. To be able to support Corporate Priority 4, Attractive Ashford, the enforcement stage needs to be implemented.
34. The contractor has been operating in Kent for other Local Authorities for over 5 years. Those who have most recently joined pilots with the company have seen positive public support for an initiative that does not cost tax payers money to provide a service but rather targets those who choose to throw down litter. However, Members should be aware that there is the possibility that there may be some negative press surrounding the provision of any enforcement.
35. The provision of the contracted service, is to be funded through the proceeds of the FPNs successfully issued. There is a risk that a percentage of people will not pay their penalties. The maximum risk would be if not one single fine was paid, however, in every other local authority, that the contractor has operated across the country, they have at least achieved cost neutrality and in the majority of cases generated a surplus income ring fenced for environmental education and enforcement.
36. This is a pilot for one year only. The maximum value to the contractor is anticipated to be £139,500 (based on 3000 tickets issued in the 12 month pilot). There will be no extension of the pilot. 6 months into the pilot, a view will be taken on the service provision. If an external service provision is to continue, a full procurement exercise will be under taken for any further contract.
37. Monthly and quarterly meetings will monitor the payment rate to ensure there are no issues with cost neutrality, which will be guaranteed by the contractor dropping their charge out rate in the unlikely event of the payment rate dropping below a break even figure, at the agreed charge out.
38. The mechanisms put in place by the contractor should ensure relatively high payment rates which have been achieved by the contractor to enable sustained relationships with other local authorities.

39. The street scene team have undertaken an extensive exercise in assessing the level of provision of public litter and dog waste bins. The bins provided are currently in the process of being upgraded to ensure they meet the needs of the borough.

Equalities Impact Assessment

40. See attached, as Appendix 3.

Other Options Considered

41. Not utilising an external resource. There is no capacity in the Council to take a proactive stance against litter. Using the contractor will provide the extra resources to make a strong statement on the aim to achieve clean and tidy towns and open spaces, in support of Priority 4 of the Corporate Plan, Attractive Ashford.
42. Increasing our own staffing levels. The initial objective is to undertake a 12 month trial. Recruiting officers, training and improving the administrative and I.T infrastructure would be more costly and take considerably more time than the proposed option.
43. Not agreeing the trial period and approaching other enforcement companies to a procure a service now. Other agencies may be able to provide officers with a similar service. It appears that the identified contractor provides a unique package, providing not only the enforcement officers but a tested back office system which provides management, administrative support and access to an area support system for identification checks. The contractors enforcement solution is adaptable and used in 7 out of the 12 Kent local authorities. It may be possible to approach other companies for a tailor made solution; however, this is likely to take considerably more time than the proposed trial, to implement.

Consultation

44. The contractor attended Ashford Borough Council to present their service to the Leader (Councillor Gerry Clarkson), Councillor Mrs Clair Bell, Portfolio Holder for Public Interaction and Borough Presentation, Councillor Galpin, Portfolio Holder for Town Centres Focus and Business Dynamics, Cllr Bradford, Portfolio Holder for Highways, Wellbeing and Safety, Councillor Dehnel, Lead Member for Compliance and Enforcement. Feedback was positive and encouraging.
45. Our Principal Legal Assistant has been involved in informal discussions on the service provision from the company.
46. Consultation with our Regeneration Manager has been positive as this service will support the presentation of the borough and has the potential to increase visitors, attracted by our clean towns. This initiative directly supports the Regeneration Managers project beginning in July 2016, "Healthy High Streets".
47. Discussions with Tenterden Town Council are very supportive of this initiative.

48. Consultation with our refuse and recycling and street cleansing contractor has been very supportive. Our contract is output based which means our litter bins should not be more than $\frac{3}{4}$ full when they are emptied. The contractor is aware that litter bin emptying will most likely need to be increased when the service commences.

Implications Assessment

49. It is anticipated that the provision of a litter enforcement service will only be viewed as a negative step by those who choose to discard their litter on the ground and are consequently affected by fines.
50. There is no cost implication to the majority of the public who dispose of their litter in the array of bins provided.

Handling

51. Should Members be minded to support this proposal, the contractor should be in a position to mobilise the contract within 8 weeks of the decision being taken.
52. Should Members be minded to support this proposal, our communications campaign to promote this initiative would begin shortly.

Conclusion

53. The enforcement activity outlined in this report should assist with cleaner and better presented town centres, whilst giving a clear indication to perpetrators that their litter belongs in the bins adequately provided across the borough.
54. It will give a clear indication that there are consequences for anti-social behaviour and drive down such activity.
55. The success of this pilot will be monitored by the number of FPNs issued, quantities of waste collected by our contractor through the town centre bin provision and quality monitoring of street cleansing.

Portfolio Holder's Views

56. I recommend the pilot of Litter and Dog Fouling enforcement, perpetrators should pay for the blight they bring to our Town. In order to regenerate the Town Centre and attract tourism it is vital that our Borough is clean and well presented. Whilst the pilot will commence in the two Town Centres, I am keen to see progress in other public areas including parks, open spaces and cemeteries. Councillor Clair Bell, Portfolio Holder for Public Interaction and Borough Presentation.
57. Over the last years the Council has undertaken to improve the Town centre environment and improve foot fall. The success of this is manifest in our approach to town centre regeneration, reductions in voids in the retail units, the revitalisation of Park Mall and the actions of T-CAT. It is unfortunate that the effort of so many is spoiled by the actions of a few who choose to litter our

street. I fully support this more robust approach to dealing with litter and dog fouling. Councillor Graham Galpin, Portfolio Holder for Town Centres Focus and Business Dynamics.

Contact: Mrs Tracey Butler

Email: tracey.butler@ashford.gov.uk

Appendix 1 Sir Litternot



Appendix 2

Litter and Dog Fouling Enforcement Policy

1. Introduction
2. Ashford Borough Council has a statutory power to enforce against the offence of leaving litter on any public open space (and some other qualified areas). This provision seeks to affect and improve the quality of life of those who live in and visit the borough.
3. This policy has been developed taking into account DEFRA guidance that the Council should always act in the public interest; it responds to the public demand for strong enforcement, supports the corporate objective of “Attractive Ashford”, and ensures consistency by supporting those officers who issue Fixed Penalty Notices (FPNs).
4. This document outlines the Councils policy on litter enforcement and how this will help to achieve the overall aims for the corporate plan.
5. In publishing this policy, The Cabinet is demonstrating its commitment to the protection of the quality of life of our residents and our environment by providing robust and effective enforcement services.
6. This Policy should be read in conjunction with the Council’s Enforcement Policy (adopted by Cabinet 12th May 2016) and the Regulator’s Compliance Code.

Statement of Policy

7. This policy is based on the four key principles:
 - **Consistency** – to ensure that similar incidents are dealt with the same way. However, each incident will be dealt with on its merits.
 - **Fairness** – to ensure a fair and even handed approach to ensure decisions are not influenced by gender, ethnic origin, or religious, political or other beliefs.
 - **Transparency** – to ensure that any enforcement action taken is easily understood by citizens and businesses.
 - **Proportionality** – to ensure that any enforcement action taken is in proportion to the actual offence

8. Ashford Borough Council as a responsible Council are committed to meeting legislative requirements and guidance in respect of public realm and street cleansing standards. Responsibility for maintaining these standards falls not only to the Council but to everyone living, working and visiting the borough. Whilst working within the terms of the Council's Enforcement Policy and its Litter Policy we will rigorously enforce the powers available to us to ensure that individual responsibilities are met and will take appropriate action against those who litter and fail to clear up after their dog has fouled. We will use intelligence and respond to complaints about such matters promptly and where appropriate will deploy our resources proactively, at times and in locations, to identify and confront offenders.
9. The Policy aims to:
 - change the behaviour of offenders
 - offer a cost effective and efficient means of punishment without prejudicing the person's right to judicial process
 - be proportionate to the nature of the offence
 - deter future non-compliance
10. Fixed Penalty Notices will be issued by Enforcement Officers authorised by Ashford Borough Council, in the majority of situations where they witness an individual intentionally littering or failing to clear up after the dog they are in control of that has fouled.
11. In the case of littering this shall apply to all public land and private land in the public domain and within the scope of the relevant legal controls (i.e. almost all publically accessible land).
12. In the case of dog fouling, this shall apply to all public land as defined in the Dogs Fouling of Land Act 1996 (i.e. all public land but with limitations concerning roads with speed limits over 40 MPH, Common Land and land already subject to Dog Control Orders under the CN&EA).
13. With reference to the above, officers should generally issue a FPN where an offence has been witnessed. Discretion not to issue a FPN will be exercised cautiously in the interests of consistency. However, examples where discretion may be exercised include:
 - Where the event witnessed was clearly unintentional or where the perpetrator has made every effort to remove the litter/dog fouling and dispose of it appropriately, or

- Where the officer believes the perpetrator is less than 18 years of age or
 - Where the perpetrator has committed this offence or a related offence previously or the offence is aggravated and therefore the officer deems it appropriate to recommend that the perpetrator be prosecuted.
 - This list is not definitive and there may be other circumstances when discretion may be exercised.
 - Where a FPN has been issued in accordance with the relevant procedure the recipient shall be required to pay the appropriate fee in full. Acceptable methods of payment are stated on the FPN. Failure to pay or failure to pay on time will normally result in the case being escalated with a view to prosecuting the offender for the original offence.
 - The company providing the Enforcement Officers to act on behalf of the Council, will deal with complaints through their formal complaints procedure. However, it should be noted that the complaints procedure does not include a mechanism by which the issuing of a FPN itself can be challenged; this is a matter for the courts to decide should the matter be brought before them.
 - Ashford Borough Council will not tolerate verbal abuse or threats of or actual physical abuse, against any of its staff. All such instances will be investigated by a senior manager and reported to the Police as necessary.
14. Officers acting on behalf of the Council will conduct themselves in a professional manner at all times.
15. If the FPN remains unpaid after the specified period a prosecution file will be prepared and passed to legal services to initiate a prosecution for the offence.

Appendix 3

When is an assessment needed?

Councils must assess the impact of **proposed policies or practices** while they are being developed, with analysis available for members before a decision is made (i.e. at Cabinet).

Broadly, *policies and practices* can be understood to embrace a full range of different activities, such as Cabinet decisions which substantially change the way in which we do something, setting budgets, developing high-level strategies, and organisational practices such as internal restructuring. Assessments should especially be undertaken if the activity relates closely to an equalities group (see next page).

Importantly, this does not include reports that are 'for note' or do not propose substantial changes –assessments should only be considered when we propose to do something differently.

Assessments should also be carried out when conducting a large-scale review of **existing policies or practices** to check that they remain non-discriminatory. This does not mean filling out an assessment on every report on a subject – it is up to you to decide if the report's scope or scale warrants an assessment.

1. General Information	
1.1 Name of project, policy, procedure, practice or issue being assessed	Litter enforcement using a private company
1.2 Service / Department	Environmental and Customer Services
1.3 Head of Service	Julie Rogers
1.4 Assessment Lead Officer	Tracey Butler
1.5 Date of Assessment	27 April 2016
1.6 Is this assessment of an existing or a proposed project, policy, procedure, practice or issue?	Assessment of a proposed policy

2. What is Being Assessed?

2.1 What are the aims of this project, policy, procedure, practice or issue?	To ensure Ashford Borough Council enforces on the offence of littering in the pursuit of Corporate Priority 4, Attractive Ashford
2.2 Who is intended to benefit from this project, policy, procedure, practice or issue?	The residents of the borough and visitors to the borough, as we will have a cleaner, more attractive borough and an enhanced reputation for the pride in our borough through robust enforcement of the offence of littering
2.3 Who else is involved in the provision of this project, policy, procedure, practice or issue? i.e. other sections, public or private bodies	
within Ashford BC	Corporate Enforcement Support and Investigations Manager Principal Legal Assistant
from other agencies	Inspector Andrew Judd, Ashford police

3. Possible Sources of Information

In order to assess the impact of proposed decision it is important to bring together all information you have on it to, analyse them and come to conclusions on how it affects those with protected characteristics.

Information on a policy, project or procedure can come in many forms:

- Census and other demographic information
- User satisfaction and other surveys
- Previous consultation exercises
- Performance Indicators
- Eligibility Criteria
- Service uptake data
- Complaints
- Customer Profiling
- MOSAIC data

In order to come to conclusions on impacts in section 4 you **must** have taken in to account all appropriate information, and be able to provide this if necessary in support of the judgements you make.

Also, it is not enough to have broad information on service users – to meet equalities duties this information **must** be broken down – where applicable – into the relevant protected characteristics which may be affected by this decision. For example, when considering disabled access to a new community facility, overall usage figures are not enough – an understanding of how many disabled users within this total must be demonstrated.

The protected characteristics are:

Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, race, religion belief, sex, sexual orientation.

More information on the definitions of these characteristics can be found here - <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>

4. What judgements can we make?

4.1 Does the evidence already available indicate that the project, policy, procedure, practice or issue may affect these groups differently? (please check the relevant box and provide evidence where possible)	Positive Impact?	Negative Impact?	No Differential Impact	If yes, can it be justified (and how)?
Impact Factors:				
Age (please detail any specific groups considered)		<input type="checkbox"/>	x	Minors will not be prosecuted for littering offences
Disability (please detail any specific groups considered)		<input type="checkbox"/>	x	
Gender (please detail any specific groups considered)		<input type="checkbox"/>	x	
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	x	
Marriage / Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	x	
Pregnancy & Maternity		<input type="checkbox"/>	x	
Race (please detail any specific groups considered)	<input type="checkbox"/>	<input type="checkbox"/>	x	
Religion / Belief	<input type="checkbox"/>	<input type="checkbox"/>	x	
Sexual Orientation (please detail any specific groups considered)	<input type="checkbox"/>	<input type="checkbox"/>	x	
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

5. Conclusions

5.1 Does the decision maximise opportunities to promote equality and good inter-group relations? If “yes” please state how?

Yes everyone over the age of 18 will be treated in the same way.

5.2 Based on the answers to the above can we confidently say that in its present form the decision treats different groups fairly (bearing in mind “fairly” may mean differently) and that no further amendment is required?

Yes

If further action is identified to ensure fair impacts please complete the Action Plan available on the intranet and attach it to this form

6. Monitoring and Review

How will monitoring of this policy, procedure or practice be reported (where appropriate)?

This policy will be monitored monthly for the next 12 months, to ensure levels of service are maintained.

When is it proposed to next review the project, policy, procedure, practice or issue?

At the 6 month point, the whole service will be assessed in terms of impacts and decision taken on the procurement of the service going forward.

Any additional comments?