

Agenda Item No: 12

Report To **CABINET**

Date of Meeting: 24th September 2020

Report Title: Modern Slavery and Human Trafficking Statement

Report Author & Job Title: Laurel Niven
Community Safety and Resilience Team Leader

Portfolio Holders & Portfolios: Cllr P Feacey - Community Safety and Wellbeing
Cllr B Barrett - Housing



Summary: The report presents for approval of the Ashford Borough Council Modern Slavery and Human Trafficking Statement.

The statement will set out the steps that Ashford Borough Council must undertake and ensure a collaborative approach to the issues across the organisation.

The statement is not a statutory requirement but is seen as best practise.

Key Decision: No

Significantly Affected Wards: All Wards

Recommendations: **Cabinet is asked to recommend that Council approve the Ashford Borough Council Modern Slavery and Human Trafficking Statement.**

Policy Overview: The statement as presented will guide elected members, officers and external partners in their roles and responsibilities to address modern slavery and human trafficking. The statement sets out to ensure a transparent organisational approach and commitment to managing and addressing these issues within the borough of Ashford.

Financial Implications: It is anticipated that the majority of actions required to fulfil our new duties will relate to staff and member training.

Legal Implications The Modern Slavery Act 2015 places a duty on specified authorities, including Local Authorities to notify the Home Office of suspected victims of modern slavery or human trafficking and to cooperate with the Anti-Slavery Commissioner.

The statement affirms our organisational responsibilities and ensures modern slavery, and human trafficking is addressed within our policies and plans.

Equalities Impact Assessment See attached

Other Material Implications: None

Exempt from Publication: No

Background Papers: None

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Report Title: Modern Slavery and Human Trafficking Statement

Introduction and Background

1. The Modern Slavery Bill received Royal Assent on 26 March 2015, the primary aim of the legislation being that law enforcement agencies have the powers they need to pursue, disrupt and bring to justice those engaged in modern slavery and human trafficking.
2. The Act introduced measures to enhance the protection of victims of slavery and trafficking and created a new 'duty to notify' on local authorities. Local authorities have a crucial role to play in tackling modern slavery, including identifying and supporting victims and working in partnership locally.
3. Section 54 of the Act requires qualifying organisations to publish an annual statement on their website detailing the steps they have taken to ensure modern slavery and human trafficking does not occur within their organisation or supply chains.
4. The purpose of this report is to present the Council's Modern Slavery and Human Trafficking Statement and request that it is approved and adopted.
5. The statement, as presented in Appendix A, highlights the steps that Ashford Borough Council must undertake to meet their obligations and ensure there is a collaborative approach to addressing the issues of modern slavery and human trafficking.

Proposal/Current Position

6. The Community Safety Unit (CSU) works closely with Kent Police and other agencies to identify and support potential victims of modern slavery and human trafficking. This is achieved through the work of multi-agency meetings, including Ashford Vulnerabilities, CSU, and Ashford Serious and Organised Crime.
7. The adoption of the statement is best practice and provides the assurance and links between the various ways of working already in place. It sets out the Council's commitment to modern slavery and human trafficking as well as identifying individual responsibilities.
8. The statement includes the following elements:
 - Introduction of the statement and explanation of the Modern Slavery Act 2015
 - Identifies responsibilities
 - Highlights organisational structure
 - Explains how supply chains are assessed through our procurement process

- Addresses policy and plans in relation to modern slavery and human trafficking
 - Clarifies the Council's due diligence
 - Ascertains key communication through initiatives and projects
 - Identifies KPIs
 - Training needs
 - Review arrangements
9. The Chief Executive is appointed as having overall responsibility for the statement with oversight being provided by Members.

Implications and Risk Assessment

10. By having an agreed statement it reduces the risk on the organisation by ensuring members, officers and external partners understand their role and the expectations placed upon them in respects of modern slavery and human trafficking.
11. There are no financial implications/costs associated with publishing a statement on an annual basis to satisfy the requirements under section 54. However, the majority of actions required to fulfil our duties will relate to staff and members training to ensure we up to date with legislation and best practice.

Equalities Impact Assessment

12. Modern slavery and human trafficking can affect anyone irrespective of gender, sexuality, age, class, religion or ethnicity. The statement covers all groups and recognises these issues may affect individuals and communities differently. The statement will confirm Ashford Borough Councils position.
13. See attached Equalities Impact Assessment.

Consultation Planned or Undertaken

14. The statement has been developed in conjunction with the Safeguarding leads group for Ashford Borough Council and alongside organisations such as Kent Police. It is directly relevant to the Community Safety Partnership objectives and has been developed having reference to the annual strategic assessment.
15. The statement has not been consulted upon publically but will be made available on the council's website. It incorporates the existing partnership work that occurs with the borough.

Other Options Considered

16. Whilst some areas have continued to take the view that s.54 does not apply to Local Authorities, it is suggested that publishing a statement is to be recommended as a matter of good practice. Failure to publish may carry the risk of creating a perception that Ashford Borough Council is less committed to tackling modern slavery and trafficking than it claims.

Reasons for Supporting Option Recommended

17. The statement will confirm the Authority's position that it will not tolerate modern slavery or human trafficking and will promote equality.

Next Steps in Process

18. Once agreed the statement will be made available to members and officers on the council's intranet and the public on the council's website.

Conclusion

19. Adoption of the statement provides a clear direction and shows the commitment by the Council in ensuring it has processes and direction in dealing with modern slavery and human trafficking.

Portfolio Holder's Views

20. We are committed to improving the quality of life for those living and working within our communities and providing a safe and secure environment. To enable people to live together free from the negative impact of Modern Slavery and Human Trafficking. The statement provides clarity and encourages consistency in our approach to dealing with the matter.

Councillor P Feacey

Contact and Email

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Modern Slavery and Human Trafficking Statement

2020-2021

Date: August 2020

Review Date: February 2021

1. Introduction

1.1 Ashford Borough Council is committed to preventing slavery and human trafficking in the delivery of its services and corporate activities. The Council recognises that slavery and human trafficking remain a hidden blight on our society and that the Authority has a responsibility to be vigilant in spotting associated risks and to strive to ensure that its supply chains are free from slavery and human trafficking at any level.

1.2 This Modern Slavery and Human Trafficking Statement details the steps the Council has taken to understand potential modern slavery risks related to its business and the measures adopted with the aim of ensuring that these offences are not committed through the delivery of services or via supply chains.

2. The Modern Slavery Act 2015

2.1 The Modern Slavery Act consolidates various offences relating to slavery and human trafficking. Broadly speaking this means that:

‘Slavery’ is where ownership is exercised over a person;

‘Servitude’ involves coercion to oblige a person to provide services;

‘Forced and compulsory labour’ is where a person works or provides services on a non-voluntary basis under the threat of a penalty;

‘Human trafficking’ involves arranging or facilitating the travel of a person with a view to exploiting them.

2.2 Section 52 of the Act imposes a duty on public authorities, including District Councils, to notify the Secretary of State of suspected victims of slavery or human trafficking.

2.3 Section 54 of the Act imposes a legal duty on commercial organisations, which supply goods and/or services from or to the United Kingdom and have a global turnover of more than £36 million, to publish a slavery and human trafficking statement each financial year.

2.4 Ashford Borough Council engages in commercial activities by providing services (some of which are statutory and others which are discretionary) and its annual turnover is greater than the specified £36 million. Whilst the Modern Slavery Act does not state that Local Authorities specifically are included within the grouping of organisations legally required to publish a statement, the Council has chosen to do so as a matter of good practice. The Council is keen to raise awareness of slavery and human trafficking and as a large-scale local employer and provider of services, it is seen as imperative that the Council makes its position of zero tolerance in respect of slavery and trafficking clear and unequivocal.

3. Responsibilities

3.1 Ashford Borough Council will meet the following standards and also expects those with whom it does business, to meet them:

- To support every individual's human right to live free from abuse, servitude and inhumane treatment;
- To promote ethical business and operational practices in corporate activity and services delivered;
- To take appropriate steps to ensure that slavery and human trafficking is not taking part in any of its business or supply chains;
- To take reports of witnessed, suspected or disclosed concerns of slavery and human trafficking seriously and to ensure that such reports are shared with appropriate law enforcement and other partner agencies in order that they can be fully investigated;
- To take appropriate action to address actual instances of slavery and human trafficking brought to the Council's attention and to take all reasonable steps to support and protect its victims.

4. Organisational structure

4.1 Ashford Borough Council is a Local Authority situated in the county of Kent. The Council provides a wide range of statutory and discretionary services delivered both directly by the Council itself, through partnership working with other agencies and through commissioned work with external contractors.

4.2 The Council's Constitution can be found at: <https://www.ashford.gov.uk/councillors-meetings-and-elections/councillors-and-meetings/the-constitution-of-ashford-borough-council/>

4.3 Details of the Council's structure and governance can be found at:

<https://www.ashford.gov.uk/transparency/our-staff/>

5. Supply chains

5.1 As part of its procurement processes, Ashford Borough Council expects that all suppliers of goods and services comply with all applicable laws, statutes, regulations and codes including the Modern Slavery Act 2015. Suppliers are also expected to have their own anti-slavery policy and to publish their own Slavery and Human Trafficking Statement (where applicable). Contract terms and conditions set out the requirements of contractors and subcontractors in relation to ensuring there is no slavery or human trafficking in their business.

5.2 The Council requires its contractors and subcontractors engaged in 'regulated activity' for children and adults at risk to have safeguarding policies, procedures and training in place and to comply with the reporting procedures in the Council's Safeguarding Policy.

6. Policies and Plans in relation to Modern Slavery

6.1 Ashford Borough Council has a range of policies and plans that reflect its commitment to acting ethically and with integrity to prevent slavery and human trafficking in its operations. These include:

6.2 **Council's Recovery Plan** – a key priority is to deliver a programme of events which allows the community to recover after the Covid pandemic. The Council's objectives in working towards achieving this aim include: maintaining and strengthening the community and voluntary sector; place based community engagement programmes and, raising awareness of services available and encouraging victims to report incidents to access the support they need.

6.3 **Ashford Borough Council's Community Safety Partnership's Community Safety Strategy** – the Partnership has a three-year Strategy in place. The Key strands of work contained within the Strategy are geared towards protecting vulnerable people from harm, including potential victims of slavery and human trafficking. The Strategy is also closely aligned to the Kent Police Control Strategy that references modern slavery and human trafficking as a priority. Partner agencies have been and will continue to work together to help identify and establish the nature and extent of slavery and human trafficking across our area and to ensure that colleagues with safeguarding and emergency planning responsibilities are well-placed to provide appropriate support to victims.

6.4 **Safeguarding Policy** –Safeguarding is the term used to protect children, young people and adults at risk from all forms of abuse, neglect, exploitation, domestic abuse, radicalisation, forced marriage and human trafficking/modern slavery. Safeguarding is everyone's responsibility.

We are committed to working in partnership with a number of agencies to safeguard the welfare of children and vulnerable adults at risk from all forms of abuse, neglect or exploitation. How we deliver our safeguarding role and ensure safeguarding is embedded across all our service areas and is set out in our [Safeguarding Policy \[pdf\] 512KB](#).

6.5 **Whistleblowing Policy** – the Council encourages all its employees, Councillors, contractors, their agents and/or subcontractors, consultants, suppliers and service providers to report concerns about any aspect of service provision, conduct of officers and others acting on behalf of the Council.

6.6 **Employee Code of Conduct** – the Council makes clear to all its employees that there are expected standards of behaviour to which they must adhere when they are representing and acting on behalf of the Council. Employee conduct and behaviour that fails to meet these standards is fully investigated and appropriate action taken.

6.7 **Recruitment Policy** – this sets out procedures followed to vet new employees to ensure that confirmation of their identities and qualifications is obtained. To comply with the Asylum, Immigration and Nationality Act 2006, prospective employees are asked to supply evidence of their eligibility to work in the United Kingdom. References are sought and followed up for all employees and relevant checks e.g. Disclosure and Barring Service (DBS) checks are carried out where relevant to the position.

6.8 Corporate Procurement Strategy – this sets out the strategic aims and principles of procurement activity, including the principles that the Council follows in the acquisition of goods, works and services from third-party and in-house providers.

6.9 Equality Policy – The council is committed to promoting equality of opportunities in its services. The Equality Act 2010 provides a framework to ensure ABC services are not provided in a discriminatory manner by having due regard to eliminating discrimination, harassment, and victimisation, advancing equality of opportunity and fostering good relations.

6.10 Under this policy, the council will also:

- Demonstrate that we have considered any vulnerability identified within the Act when deciding to proceed to legal action.
- Have concluded that legal action is needed due to the effect of the ASB on either the health of the victim and/or perpetrator.
- Ensure that the proposed legal action is a proportionate response to the ASB.

7. Due Diligence

7.1 Ashford Borough Council's approach to procurement requires suppliers of goods and services to implement due diligence procedures in relation to slavery and human trafficking with their own suppliers, subcontractors and other participants in their supply chain where their annual turnover exceeds £36 million.

7.2 As part of the Council's commitment to identify and mitigate risk, Council departments work together and alongside partner agencies to:

- Identify and assess potential risk areas in its business affairs;
- Mitigate the risk of slavery and human trafficking through robust checks and balances;
- Monitor and review any potential risk areas identified;
- Protect whistleblowers.

8. Ensuring employees, partner agency colleagues and Council Members are well-informed

8.1 Specific projects and initiatives

8.1.1 Ashford Borough Council Vulnerability Meeting

This multi-agency meeting (known as the Vulnerability Meeting) takes place on a monthly basis. Jointly led by Kent Police and Ashford Borough Council, it has a broad membership and its key purpose is to ensure that all agencies are working together to share intelligence, help identify vulnerable adults and agree actions that can be taken to provide tailored support. Referrals of individuals can be made by any of the agencies attending the meeting.

8.1.2 Ashford Serious Organised Crime Group

This second multi-agency group also meets on a monthly basis to share intelligence in respect of individuals who may be part of serious and organised crime networks with the aim of disrupting their offending, bringing them to justice and supporting

victims. The Group will consider referrals where there is concern that slavery or human trafficking is part of the criminal activity. This is an effective approach and resultant work has led to referrals being made through the NRM and using the Modern Slavery Notification process. We have engaged with Operation Clean Sweep which highlighted certain areas of concern and proactively engaged with businesses in the Borough to highlight any potential victims.

8.1.3 Corporate Safeguarding Group

The Council has a Safeguarding Group, comprised of officers from relevant Council departments that have specific safeguarding duties. Any cases of suspected modern slavery and/or human trafficking are referred to this Group in order that appropriate action can be taken drawing upon the expertise of the different officers involved and to act as swiftly as possible to protect the suspected victims from further potential harm.

9. Key Performance Indicators measuring effectiveness

9.1 Ashford Borough Council will use the following steps to regularly review and monitor the measures being implemented to address slavery and human trafficking and to safeguard against such activity in any part of its business or supply chains:

- i) Keep records of training delivered;
- ii) Carry out an annual review to identify any deficiencies within our policies and practices and take appropriate action to rectify these to strengthen our ability to address slavery and human trafficking.

10 Training

10.1 Ashford Borough Council's Community Safety Unit (CSU) has carried out activity to raise awareness of slavery and human trafficking and of services available to assist victims.

The latest conference event was held in March 2020 and included a detailed session on Modern Slavery and Human Trafficking delivered by specialist officers from Kent Police. This included:

- The key provisions and principles of the Modern Slavery Act 2015;
- Explanations of the National Referral Mechanism and how to report suspected or disclosed incidents of abuse or neglect that could be offences of slavery or as a result of trafficking;
- Specialist services available to support victims;
- Specific examples of cases.

10.2 In addition to training already provided, it is recognised that it is important to ensure that Council Members are aware of these issues and the legal obligations of the Authority. Further training sessions will be provided in the next financial year for new staff members and Councillors.

11 Statement Review

11.1 This statement will be reviewed every year. It will be amended, if necessary, to take into account new legal requirements, non-statutory guidance from central government and implementation of relevant industry standards.

This Statement has been approved by:

Signed.....

Councillor Clarkson, Leader

Date

Signed.....

Tracey Kerly, Chief Executive

Date

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

- (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
- (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
- (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
- (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership*
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:
- removing or minimising disadvantages suffered by people due to their protected characteristics.
 - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
 - encouraging people with certain protected characteristics to participate in public life or in other activities where it is disproportionately low.
7. How much regard is 'due' will depend on the circumstances. The greater the

potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.

8. In terms of timing:

- Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
- Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
- The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Armed Forces Community

9. As part of the council's commitment to the Armed Forces Community made through the signing of the Armed Forces Covenant the council's Cabinet agreed in November 2017 that potential impacts on the Armed Forces Community should be considered as part of the Equality Impact Assessment process.

10. Accordingly, due regard should also be had throughout the decision making process to potential impacts on the groups covered by the Armed Forces Covenant:

- Current serving members of the Armed Forces (both Regular and Reserve)
- Former serving members of the Armed Forces (both Regular and Reserve)
- The families of current and former Armed Forces personnel.

Case law principles

11. A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

• The Equality and Human Rights Commission has published guidance which public authorities should read and follow this when developing or reviewing policies and services.

Lead officer:	Laurel Niven Community Safety and Resilience Team Leader
Decision maker:	Cabinet
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	<p>To approve the Modern Slavery and Human Trafficking statement to ensure a transparent organisational approach and commitment to managing and addressing these issues within the borough of Ashford.</p> <p>The statement will set out the steps that Ashford Borough Council must undertake and ensure a joined-up approach to the issues across the organisation.</p>
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	24 th September 2020
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	<p>This statement sets out a framework for the Ashford approach for dealing effectively with modern slavery and human trafficking across the borough. It ensures the Council has adequate processes in place to meet its legislative and regulatory obligations.</p> <p>The statement provides clarity on how the Council meets its responsibilities under the Modern Slavery Act 2015.</p> <p>The statement as presented will guide elected members, officers and external partners in their roles and responsibilities. The statement sets out to ensure a transparent organisational approach and commitment to managing and addressing these issues within the borough of Ashford.</p>
Information and research: <ul style="list-style-type: none"> • Outline the information and research that has informed the decision. • Include sources and key findings. 	<p>The Modern Slavery Bill received Royal Assent on 26 March 2015, the primary aim of the legislation being that law enforcement agencies have the powers they need to pursue, disrupt and bring to justice those engaged in modern slavery and human trafficking.</p> <p>The Act introduced measures to enhance the protection of victims of slavery and trafficking and created a new 'duty to notify' on Local Authorities. Local authorities have a crucial role to play in tackling modern slavery, including identifying and supporting victims and working in partnership locally.</p> <p>Section 54 of the Act requires qualifying organisations to publish an annual statement on their website detailing the steps they have taken to ensure modern slavery and human trafficking does not occur within their organisation or supply chains.</p>

	Modern Slavery and Human Trafficking is one of the focuses on the Community Safety Partnership (CSP) Strategic assessment action plan.
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<p>Consultation:</p> <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>The statement has been reviewed by the safeguarding leads Officer Group for Ashford Borough Council, and is supported by Cllr Feacey who is our Member Champion for Safeguarding.</p> <p>In addition to this discussions have taken place with Kent and Essex Police, Protect Prevent and Modern Slavery and Human Trafficking Coordinator.</p> <p>This statement will enable the council to act quickly and effectively to tackle Modern Slavery and Human Trafficking using the framework provided.</p>
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Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u>		
Elderly	HIGH	Positive
Middle age	LOW	Positive
Young adult	HIGH	Positive
Children	MEDIUM	Positive
<u>DISABILITY</u>		
Physical	HIGH	Positive
Mental	HIGH	Positive
Sensory	MEDIUM	Positive
<u>GENDER RE-ASSIGNMENT</u>	HIGH	Positive
<u>MARRIAGE/CIVIL PARTNERSHIP</u>	LOW	Positive
<u>PREGNANCY/MATERNITY</u>	LOW	Positive

<u>RACE</u>	HIGH	Positive
<u>RELIGION OR BELIEF</u>	MEDIUM	Positive
<u>SEX</u> Men	MEDIUM	Positive
Women	MEDIUM	Positive
<u>SEXUAL ORIENTATION</u>	HIGH	Positive
<u>ARMED FORCES COMMUNITY</u> Regular/Reserve personnel	LOW	Positive
Former service personnel	LOW	Positive
Service families	LOW	Positive

Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	N/A
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Is the decision relevant to the aims of the equality duty?	
Guidance on the aims can be found in the EHRC's Essential Guide , alongside fuller PSED Technical Guidance .	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	No
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	No
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	No

Conclusion:	
<ul style="list-style-type: none"> Consider how due regard has been had to the equality duty, from start to finish. There should be no unlawful discrimination 	<p>The assessment highlights the positive impacts of the decision across the protected characteristics. Therefore there will be no unlawful discrimination arising from the statement.</p> <p>This statement will be reviewed yearly by the Head of Community Safety and Wellbeing, then every three years by</p>

<p>arising from the decision (see guidance above).</p> <ul style="list-style-type: none"> • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified. • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported? 	<p>cabinet members. It will be amended, if necessary, to take into account new legal requirements, non-statutory guidance from central government and implementation of relevant industry standards.</p>
<p>EIA completion date:</p>	<p>August 2020</p>