

KENT COUNTY COUNCIL
EQUALITY IMPACT ASSESSMENT

Please read the EIA GUIDANCE and the EIA flow chart available on KNet.
This form dated 28/02/2011 supersedes all previous EIA/ CIA forms

Directorate: EHW

Name of policy, procedure, project or service

*Policy for Management of Obstructions and Temporary Items on the Highway
(Implementation of a more streamlined arrangement for the placing of
Advertising boards on the highway, by removal of administration and charges
relating to licensing as permitted under policy, relating to A-boards only.)*

Type

*Policy Implementation - Process for managing Advertising boards on the
Highway*

Responsible Owner/ Senior Officer

David Beaver

Date of Initial Screening

3rd March DB/DL

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Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
Age	Y	N	N	M	a) Yes - to reduce/remove potential negative impact from possible increased numbers of advertising boards not complying with guidelines, so affecting ease of access to use the highway. b) Yes - to identify a way to achieve desired result through voluntary compliance c) If businesses take responsibility and comply, this will benefit all highway users, particularly sight and mobility impaired users, like the elderly and those walking with small children.
Disability	Y	N	N	M	a) Yes - to reduce/remove potential negative impact from possible increased numbers of advertising boards not complying with guidelines, so affecting ease of access to use the highway. b) Yes - to identify a way to achieve desired result through voluntary compliance c) If businesses take responsibility and comply, this will benefit all highway users, particularly sight and mobility impaired users.
Gender	N	N	N	N	
Gender identity	N	N	N	N	

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Race	N	N	N	N	
Religion or belief	N	N	N	N	
Sexual orientation	N	N	N	N	
Pregnancy and maternity	Y	Y	N	M	<p>a) Yes - to reduce/remove potential negative impact from possible increased numbers of advertising boards not complying with guidelines, so affecting ease of access to use the highway.</p> <p>b) Yes - to identify a way to achieve desired result through voluntary compliance</p> <p>c) If businesses take responsibility and comply, this will benefit all highway users, including mums to be and those with pushchairs or small children.</p>

Part 1: INITIAL SCREENING

Context

Explain how this policy, procedure, project or service relates to a wider strategy

The change to Policy implementation results from a review of Policy and seeks to encourage responsible practice within the business community, in place of formal licensing regulation. Local councils, town centre management groups and business groups are being involved to work with the ideals of localism and the Big Society, to help find more locally appropriate solutions, reducing Street Clutter and to foster co-operation between local groups.

Aims and Objectives

Provide a summary of what the policy, procedure, project or service is trying to achieve and how it will be achieved

The proposal is to remove the administration, charges and formal licensing of Advertising boards on the highway, whilst still restricting placement of boards through set requirements – and so simplify the management of Advertising boards, encouraging more businesses to comply with the set requirements.

Beneficiaries

Set out who the intended beneficiaries?

Highway users will benefit from greater business compliance and reduced 'street clutter'

There is a saving in initial administration time in processing licenses for Kent Highway Services within KCC.

Businesses have no licensing charges to pay.

Communities should benefit from a greater drive for localised control and solutions

Consultation and data

Please record any data/research and/or consultation you have carried out to inform your screening

Further background data

Discussion and demonstration of the practical difficulties experienced by visually impaired users has helped KHS staff to identify best practice with A-boards in particular, relating to placement and type of board.

A survey of A-boards in use showed that the 74% of business are already complying and there is opportunity to increase this through better awareness campaigns.

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Consultation results

Comment was invited through consultation through;
 District, Town and Borough Councils
 Kent Association of Local Councils
 Centres of Commerce
 Town Centre Management Groups

Protect Vulnerable users	Reasonable for local businesses	Adherence to requirements	Support Promotion & Adherence	Active support awareness	Comments
9 Yes	12 Yes	3 Yes	8 Yes	8 Yes	General concerns on Enforcement
3 Maybe	1 Maybe	8 Maybe	1 limited	2 limited	Financial recompense for active support required
2 No	1 No	2 No	3 No	2 No	Not enough time for consultation

Generally, this group report that they perceive that the requirements protect vulnerable road users and are reasonable for local business. There is concern around compliance to the requirements without the ability to apply penalties. This group would support promotion and awareness. Ultimately they see enforcement as a County Council function.

Kent Reference Panel and other visually impaired organisations report as follows;

Protect Vulnerable users	Reasonable for local businesses	Adherence to requirements	Active support awareness	Comments
0 Yes		0 Yes	1 limited	Real concern about loss of licensing
2 Maybe		1 Maybe		How will this be enforced
2 No		3 No		KAB understand need for balanced approach

This group are representative of those within the disability screening characteristic; they do not believe that the requirements alone protect vulnerable users without licensing and applying penalties for non compliance.

Potential Impact

Provide a summary of the results from your initial screening, highlighting where there is any potential positive or adverse impact. If there is no impact on any group or the impact is unknown please state that here.

The proposed change from current formal licensing and charging has the potential to disadvantage any group with mobility difficulties or need for greater space – Age, Disability and Pregnancy and Maternity. In particular, this would include young and old (those with small children and pushchairs etc), less mobile pedestrians using aids to get about, disabled pedestrians and visually impaired.

No impact was identified for any other specific group.

Adverse Impact: As a result of removing the need for a license there may be more boards on the highway legitimately. Where businesses do not comply voluntarily, those groups identified above, are likely to continue to experience difficulties with boards, until enforcement processes start to have effect.

Positive Impact: The same standards of compliance with A-board requirements can be achieved with reduced regulation, although there is no clear additional positive impact for any specific group. The aim to drive voluntary compliance would hope to bring initial results more quickly, than regulatory processes such as licensing, benefiting all groups earlier, although this does depend on businesses complying and local involvement to make this happen quickly.

JUDGEMENT

Option 1 – Screening Sufficient ~~YES/NO~~

Following this initial screening our judgement is that no further action is required.

Justification:

Option 2 – Internal Action Required YES/~~NO~~

There is potential for adverse impact on particular groups and we have found scope to improve the proposal

(Complete the Action Plan at the end of this document)

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Option 3 – Full Impact Assessment ~~YES~~/NO

Only go to full impact assessment if an adverse impact has been identified that will need to undertake further analysis, consultation and action

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed: David Beaver

Date: 28th March 2011

Name: David Beaver

Job Title: Head of Network Management

Directorate Equality Lead

Signed:

Date:

Name:

Part 2: FULL ASSESSMENT

Name

Of the policy, procedure, project or service

Responsible Owner/ Senior Officer:

Date of Full Equality Impact Assessment:

Scope of the Assessment

Set out what the assessment is going to focus on, as directed by the findings from your initial screening

Information and Data

State what information/data/research you have used to help you carry out your assessment

Involvement and Engagement

Provide details of all the involvement and engagement activity you have undertaken in carrying out this assessment and summarise the main findings

Judgement

Set out below the implications you have found from your assessment for the relevant diversity groups. If any negative impacts can be justified please clearly explain why.

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Action Plan

Provide details of how you are going to deal with the issues raised in judgement above and complete the Action plan at the end of this document

Monitoring and Review

Provide details of how you intend to monitor and review progress against the above actions

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Date:

Name:

Job Title:

Directorate Equality Lead

Signed:

Date:

Name:

31/03/2011

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
Age, Disability, Pregnancy and Maternity	Access to use highway is significantly affected if businesses do not comply to A-board requirements. More boards may be legitimately placed than would have been licensed, - charges would have meant some boards are removed	Informing businesses of need to consider highway users – their customers and of the requirements to place A-boards. Awareness campaign for businesses to consider and adopt other methods of advertising off the highway to reduce the number of boards placed. The best options to improve the compliance is working with partners and using highway stewards to	Better Voluntary compliance and reduced numbers of boards.	Head of Highway Operations	July - December	Minimal however in-direct costs of staff time

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		<p>increase awareness, provide direct advice, and follow through on businesses that do not comply with face to face contact and communication. Perhaps a review on compliance after 6 months to measure the level of compliance and improvement will validate the effectiveness of this approach.</p>				
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