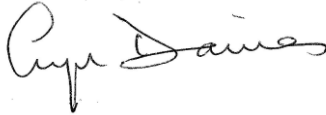



Appendix 1



Equality Impact Assessment (EIA)

Name of Policy or Practice	Sand Clearance at West Shore		
Head of Service responsible for the Policy or Practice	Geraint Edwards		
Name of officer (s) completing impact assessment form	Lyn Davies		
Service	ERF	Date of Assessment	24/5/16

EIA Completed by :		EIA Agreed by Head of Service :	
Date	24/5/16	Date	1/7/2016
Name(s)	Lyn Davies	Name	Geraint Edwards
Signature(s)		Signature	

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? **(Please double click on the box and select 'checked' as appropriate to cross X)**
- New and revised policies or practices
 - New procedures (which modify service delivery or employment practices)
 - Service review or re-organisation proposals which affect the community and/or staff

- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below:

2. What are the overall aims and objectives of the policy or practice?

To allow sand clearance at West Shore, Llandudno to align with available budget

3. Who is the policy or practice intended to help or benefit (stakeholders)?

West Shore residents and users of the coastal path.

4. Who are the main consultative groups or communities of interest?

Local community at West Shore, Conwy Voluntary Access Group.

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	None
Disability	Limited access in winter period to people with mobility issues.
Sex	None
Age	None
Religion & Belief	None
Sexual Orientation	None
Gender Reassignment	None
Marriage & Civil Partnership	None
Pregnancy & Maternity	None
Welsh Language	None
Other (please state)	

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
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<p>Initial EIA Screening 12 complaints in 2015/16 about sand in this area. The complaints vary in type between sand in people's gardens to sand blocking the cycle path.</p>	<p>Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits</p>
<p>Research or Comparative Information</p>	<p>Examples</p>
<p>None</p>	<p>Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)</p>

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes No *(please cross as appropriate X)* If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes

No

(please cross as appropriate X)

If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

The West Shore coastal path and promenade is often blocked by sand build up due to prevailing onshore winds depositing sand in these areas. During these times of inaccessibility people with mobility issues may find it difficult to access the pathway/promenade.

11. Does the geography or demography of any groups reveal anything?

The coastal geography, along with the weather, is directly responsible for the problem. The Local Access Forum comprises individuals from all parts of Conwy.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

Wheelchair users or people with limited mobility, due to the depth of sand deposited on the pathway, would find it difficult to access the coastal pathway in winter or between clearances in the summer when periods of high winds had deposited sand.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

No

14. Do any of these limitations amount to unlawful discrimination?

Yes No Not Sure
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race	Black Minority Ethnic groups Gypsies / Travellers Language
Disability Mobility	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities

Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership	
Pregnancy & Maternity	
Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes No Not Sure
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

The pathway was not designed to be wheelchair accessible. The surface is unbound and there are lips, slopes and hazards commensurate with its coastal location. It is accepted however that the path could be used by certain types of wheelchair when free of sand. It is not suitable for mobility scooters at any time of year. The pathways in generally become blocked by sand in winter and therefore likely to be unuseable to people with mobility issues. The current procedure seeks to best use the resources available to clear the pathway during the summer period.

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

People with mobility disabilities may use the coastal pathway/promenades when they are passable so it is logical to assume that they are stopped from using the pathways when they become impassable due to sand build up.

The Local Access Forum was consulted and they were in agreement that, whilst all year sand clearance was best, in view of the financial constraints, the amount of sand and frequency of deposition then it would be best to concentrate our resources in the summer period when most people were likely to use the pathway.

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

The budget for sand clearance can be used more efficiently by formalising a clearance regime that maintains year round pedestrian access and cycle/restricted mobility access in summer only. In the current situation, cycle and restricted mobility access during the winter is only possible in the few days following a clearance. Frequent clearances in summer will result in a higher total number of accessible days than expending the same resource during severe winter weather. Additionally, signage will be introduced to alert people to the fact that the pathway is likely to be impassable to people with limited mobility both in the wintertime and after high winds in the summer. Consider alternative solutions.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

Re- consult with the Disability Access Group within 12 months of the policy being in place and communicate the reasons for the policy.

21. What actions could you take to achieve the same goal by an alternative means?

An alternative route will be explored to the east of the existing path, on the boundary with the golf course, which may give greater possibility for all year round mobility access.

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy/practice can be signed off				
Consult with Disability Access Forum	Consultation	May 17 th 2016	Lyn Davies	

Actions after EIA and policy/practice signed off				
Feasibility study for re-routing the current pathway	Outcome of study	March 2017	Lyn Davies	

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision		Action
<input checked="" type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Consult again with Disability Access Forum after revised practice in place for 12 months.	June 2017	Lyn Davies	
Monitor results of feasibility study and if scheme viable, submit capital business case for finance to re-route the coastal path.	Following the feasibility study, the business case will be submitted as soon as possible after this date.	Lyn Davies	

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.