



# Equality analysis template 2013

### Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of your policies and practices on people with different protected characteristics is an important part of complying with the general equality duty.

Under the PSED the Council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the EHRC recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it. As before where practical & proportionate.
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in equality impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils.

Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity It be referenced in community impact statements in Council reports.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should be written in a clear and transparent way using plain English. It may be published under the Council's publishing of equality information, or if part of a business plan, requested by the public under the Council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if the affects you expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Equality Analysis will not need to go to an Equality and Diversity Panel for feedback, as under the old Equalities and Human Rights Scheme. Community engagement is recommended as part of the development of equality analysis and the Council's Community Engagement Division and FEHRS can assist with this (see section below on community engagement).  
[www.southwarkadvice.org.uk](http://www.southwarkadvice.org.uk)

## Section 2: Equality analysis details

<b>Proposed policy/decision/business plan to which this equality analysis relates</b>		New Travellers Agreement			
<b>Equality analysis author</b>		Angela d'Urso, business manager, housing operations Paul Jeffery, Gypsies and Travellers officer, housing operations			
<b>Strategic Director:</b>		Gerri Scott, Strategic Director of Housing Services			
<b>Department</b>		Housing Services	<b>Division</b>	Community Housing	
<b>Period analysis undertaken</b>		January 2013			
<b>Date of review (if applicable)</b>		N/A			
<b>Sign-off</b>	Paul Langford	<b>Position</b>	Head of Operations	<b>Date</b>	14/2/13

## Section 1: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan
<ol style="list-style-type: none"> <li>1. Through the commencement on the 30<sup>th</sup> April 2011 of Section 318 of the <i>Housing and Regeneration Act 2008</i> the <i>Mobile Homes Act 1983</i> ("the Act") applied to local authority gypsy and traveller sites.</li> <li>2. The provisions of the Act prescribe the form for all new pitch agreements. This means that the council needs to finalise a new agreement in accordance with the Act.</li> <li>3. Gypsy and Travellers is a specialist area and the development of an accurate, comprehensive and enforceable agreement is vital as once the new agreement is entered into the terms and conditions cannot be varied (even as to rent) without the specific agreement of the parties. Any clarifications or issues must be dealt with on application to the Property Tribunal.</li> <li>4. A new agreement has been prepared by the business manager in conjunction with legal services, finance and the Gypsies and Travellers officer who manages the sites. The new agreement was developed using as a base a national draft developed in conjunction with a network of county councils and other authorities.</li> </ol>

## Section 2: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
<b>Key users of the department or service</b>	Southwark Travellers' Action Group (STAG) Southwark Gypsies and Travellers
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	Cllr Wingfield, cabinet member for housing Overview and Scrutiny Committee Paul Jeffery, Gypsies and Travellers Officer Emily Springford, Specialist Litigation Lawyer Southwark Travellers' Action Group (STAG) Southwark Gypsies and Travellers

## Section 3: Pre-implementation equality analysis

This section considers the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and Human Rights, the equality information on which above analysis is based and mitigating actions to be taken.

<b>Age</b> - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>
<p>The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:</p> <ul style="list-style-type: none"> <li>• Earlier death and worse health, including less effective health care</li> <li>• Older people receiving little support with housing needs</li> <li>• Leaving school early, a lack of access to out of school services and accelerated criminalisation for young people</li> </ul> <p>A lack of suitable accommodation can lead to occupations of unsuitable encampments, evictions and unstable habitation. This has a severe impact on education access and health care.</p> <p>The terms implied into pitch agreements by the Act affords Gypsies and Travellers a significant increase in security of residence and rights of occupation. The new agreements also places a number of responsibilities upon the council to ensure the sites are of a good standard, well maintained and well serviced.</p> <p>The agreement also clearly states that the council will not unreasonably refuse adaptations</p>

and that alterations to cater for the needs of elderly or disabled occupants will be supported as far as possible – taking into consideration the need of older people with willing family carers the support network of their community – reducing the need for them to move and therefore have a negative impact upon their way of life.

The new agreement has a clear right to exchange pitches (based on no rent arrears and upholding of the agreement) and clear succession entitlement.

The agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their age.
- The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their age. We will work with STAG to address any issues.

### **Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: “Inequalities experienced by Gypsy and Traveller Communities: A review” (2009)

According to our records, across all sites there are:

- Under 18 – 43 individuals
- 19 – 59 – 33 individuals
- 60 and over – 1 individual

There are at least 14 individuals where we do not know their age.

The Gypsies and Travellers Officer has also input based on his knowledge of residents across all sites.

### **Mitigating actions to be taken**

As part of the consultation process and in signing new agreements, we will improve our data held on age across the sites.

We will also maintain and/or improve the data held through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

We are also aware that:

- Public Health will work with STAG to improve access to doctor’s practice by providing information and support
- Southwark Clinical Commissioning / Public Health / STAG will develop a training programme for health professionals to understand the needs of the Gypsy and Traveller communities in Southwark.
- Nell Gwyn Nursery School and East Peckham Children's Centre to work, with the support of STAG, to restart a dedicated session for Traveller parents and children. This will focus on improving access to Children’s Centres activities, Nursery school (Early Years offer), anti natal care, health and social care (such as weaning, parenting skills, immunisation etc)
- Pilgrims Way Children’s centre to nominate a dedicated officer to build outreach links with the Gypsy and Traveller community to improve access to Children’s Centre activities and Nursery schools.
- Social Services and Community Safety are organising a session for the Gypsy and Traveller community in Southwark on their safeguarding role and explain how

- referrals work, ensuring that accurate information is given and myths dealt with.
- Social Services and Community Safety are identifying lead officers to work with the Gypsy and Traveller community in Southwark. These officers will be appropriately trained and understand issues such as Health and Safety on site. This will enable relationships to be established and promote better understanding between all parties.

**Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- Earlier death and worse health, including less effective health care
- Disabled people receive little support with housing needs
- A high proportion of the community report bad backs and other work related injuries.

A lack of suitable accommodation can lead to occupations of unsuitable encampments, evictions and unstable habitation. This has a severe impact on health care.

The terms implied into pitch agreements by the Act affords Gypsies and Travellers a significant increase in security of residence and rights of occupation. This increase in security will support access to long term health care.

The agreement also clearly states that the council will not unreasonably refuse adaptations and that alterations to cater for the needs of elderly or disabled occupants will be supported as far as possible – taking into consideration the need of disabled people with willing family carers and the support network of their community – reducing the need for them to move and therefore have a negative impact upon their way of life.

The new agreement has a clear right to exchange pitches (based on no rent arrears and upholding of the agreement) and clear succession entitlement.

There is potential that specific disabilities could impact upon some of the obligations of the agreement due to the nature of their disability. The council will of course recognise extenuating circumstances.

The agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their disability.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their disability. We will work with STAG to address any issues.

**Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

The council does not hold specific information on occupants' disabilities. The Gypsies and Travellers Officer has input based on his knowledge of residents across all sites.

Officers have also used external information. The Disability Rights Commission estimates that one in five adults will have a disability, so based on our current records approximately 18 of the occupiers on the site would be expected to have a disability.

#### **Mitigating actions to be taken**

The Gypsies and Travellers officer will ensure that residents understand the obligations of the agreement at sign up. This will also be addressed in full by the consultation team.

The Gypsies and Travellers officer will signpost and refer to appropriate support agencies, as well as working with other services to ensure that adequate support is provided, enabling disabled residents to benefit from the new agreement.

As part of the consultation process and in signing new agreements, we will improve our data held on disability across the sites.

We will also maintain and/or improve the data held on disability through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

We are also aware that:

- Public Health will work with STAG to improve access to doctor's practice by providing information and support
- Southwark Clinical Commissioning / Public Health / STAG will develop a training programme for health professionals to understand the needs of the Gypsy and Traveller communities in Southwark.

**Gender reassignment** - The process of transitioning from one gender to another.

#### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- A lack of support for vulnerable people.

The terms implied into pitch agreements by the Act affords Gypsies and Travellers a significant increase in security of residence and rights of occupation. This increase in security will support access to healthcare and support services.

The agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their gender reassignment.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their gender reassignment. We will work with STAG to address any issues.

**Equality information on which above analysis is based.**



The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

Gender reassignment is becoming increasingly common but it still a relatively small number of the UK population.

We do not currently hold information on gender reassignment so this analysis is based on officer knowledge of the travellers currently occupying Southwark's sites. There are no known individuals on the sites who are affected by gender reassignment.

#### **Mitigating actions to be taken**

The Gypsies and Travellers officer will signpost and refer to appropriate support agencies, as well as working with other services to ensure that adequate support is provided for any individuals affected by gender reassignment.

As part of the consultation process and in signing new agreements, we will improve our data held on gender reassignment across the sites.

We will also maintain and/or improve the data held on gender reassignment through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

**Marriage and civil partnership** - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters. **(Only to be considered in respect to the need to eliminate discrimination.)**

#### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

Joint occupants are allowed for within the agreement and it does not discriminate in terms of marriage or civil partnership or cohabiting partners.

The agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their marriage or civil partnership.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their marriage or civil partnership or cohabiting status. We will work with STAG to address any issues.

#### **Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

There are three registered joint tenants across all sites currently. There is limited information on marital or civil partnership status and analysis is based on officer knowledge of the travellers currently occupying Southwark's sites.

**Mitigating actions to be taken**

As part of the consultation process and in signing new agreements, we will improve our data held on marriage and civil partnership across the sites.

We will also maintain and/or improve the data held on marriage and civil partnership through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

**Pregnancy and maternity** - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- A lack of support for vulnerable people.
- Less effective health care, including maternity services

The terms implied into pitch agreements by the Act affords Gypsies and Travellers a significant increase in security of residence and rights of occupation. This increase in security will support access to healthcare and support services.

The agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their pregnancy or breastfeeding.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their pregnancy or breastfeeding. We will work with STAG to address any issues.

**Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

We do not hold details on pregnancy on our travellers' sites.

The analysis is based on officer knowledge of the travellers currently occupying Southwark's sites.

#### **Mitigating actions to be taken**

We are also aware that:

- Public Health will work with STAG to improve access to doctor's practice by providing information and support to Gypsies and Travellers
- Southwark Clinical Commissioning / Public Health / STAG will develop a training programme for health professionals to understand the needs of the Gypsy and Traveller communities in Southwark.
- Smoking cessation courses will be offered to Gypsies and Travellers
- Breast-feeding, weaning and obesity are raised at the proposed parent and child group at Nell Gwyn

**Race** - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

#### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

Romany Gypsies and Irish Travellers are recognised as having a protected characteristic under the Equality Act 2010. In accordance with section 149 of the Equality Act 2010, the council has had due regard to the needs of these protected groups in formulating the new traveller site policy.

The agreement requires that:

- The sole or at least one of the joint occupiers under this pitch agreement confirms, by entering into this agreement, that they are a Gypsy or a Traveller within the definition made under the Housing Act 2004.

This gives protection for the pitches to be used for gypsies and travellers.

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- A lack of support for vulnerable people
- Racism is common and often overt, with authorities failing to challenge abusive commentary
- Little appreciation of culture and identity by others, leading to low self esteem
- Well managed site provision is essential to stop conflict with sedentary communities

Research shows that once members of Gypsy and Traveller communities become known as neighbours, integrated into local society and resident on well managed sites, fear of them as a community and as individuals recedes.

The terms implied into pitch agreements by the Act places clear responsibilities upon the council to ensure the sites are well managed and maintained, which should foster improved relationships with others for the Gypsy and Travellers community. It also makes offers of mediation to resolve disputes with other residents and third parties, ensuring we take our

responsibility to tackle racism seriously.

Due to possible economic exclusion and the fact that Gypsies and Travellers who do work are often self employed, the clause forbidding business on the sites has been removed, although there some reasonable conditions.

The consultation process will also support Gypsies and Travellers understanding of the agreement and their obligations and will therefore reduce the likelihood of enforcement action being taken, thereby supporting security of occupation.

Some of our sites are currently divided on racial grounds and are seen by occupants as family sites.

The new agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their ethnic background or race.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their race. We will work with STAG to address any issues.

#### **Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

Analysis is based on officer knowledge of the sites.

#### **Mitigating actions to be taken**

As part of the consultation process and in signing new agreements, we will improve our data held on race across the sites.

We will also maintain and/or improve the data held on race through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

We will look into the possibility of on site storage and/or workshop provision in the future.

We are also aware that:

- Consultation that is due to be launched into the future of housing provision in the borough should include future provision for Gypsy and Traveller sites. We will ensure Gypsies and Travellers are consulted fully and in partnership with STAG.
- The council is planning to develop an over-arching framework for engagement with, and providing services for, the Gypsy and Traveller communities in Southwark. We will play a full part in this.
- Social Services and Community Safety are identifying lead officers to work with the Gypsy and Traveller community in Southwark. These officers will be appropriately trained and understand issues such as Health and Safety on site. This will enable relationships to be established and promote better understanding between all parties.

**Religion and belief** - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.



**Possible impacts (positive and negative) of proposed policy/decision/business plan**

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- Little appreciation of culture and identity by others, leading to low self esteem

The agreement makes it clear that discrimination should not take place on religious grounds, and clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their religion or beliefs

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their religion or beliefs. We will work with STAG to address any issues.

**Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

The council does not hold information on the religion of Gypsies and Travellers. Analysis is based on officer knowledge of residents of Southwark's sites.

**Mitigating actions to be taken**

As part of the consultation process and in signing new agreements, we will improve our data held on religion and belief across the sites.

We will also maintain and/or improve the data held on religion and belief through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

**Sex** - A man or a woman.

**Possible impacts (positive and negative) of proposed policy/decision/business plan**

The agreement applies to men and woman equally. Both are able to apply and therefore the agreement would apply equally to them both.

The Equalities and Human Rights Commission (EHRC) review of inequalities experienced by

Gypsy and Traveller communities identifies key inequalities / problems which mainly flow from ethnicity and nomadic lifestyle, including:

- Women are discouraged from non traditional work / work outside the home
- A lack of support for vulnerable people, including victims of domestic abuse

The new agreement clearly states:

- You must not discriminate, intimidate, harass or abuse anyone because of their sex.

The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their sex. We will work with STAG to address any issues.

### **Equality information on which above analysis is based**

The Equalities and Human Rights Committee research report: "Inequalities experienced by Gypsy and Traveller Communities: A review" (2009)

According to our records where we have them there are a total of 62 women resident on the Gypsies and Travellers sites, and 31 men.

Analysis is also based on officer knowledge of residents of Southwark's sites.

### **Mitigating actions to be taken**

As part of the consultation process and in signing new agreements, we will improve our data held on sex across the sites.

We will also maintain and/or improve the data held on sex through our tenancy checks programme.

This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.

We are aware that:

- Community Safety and Southwark Advocacy and Support Services (SASS) will be working with STAG to improve access and referrals to the domestic abuse service (including MARAC referrals where appropriate) and to minimise STAG involvement in the handling of domestic abuse cases. The Gypsies and Travellers officer will support this and work with colleagues to ensure this happens.

**Sexual orientation** - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

### **Possible impacts (positive and negative) of proposed policy/decision/business plan**

The terms implied into pitch agreements by the Act do not discriminate according to sexual orientation.

The new agreement clearly states:

<ul style="list-style-type: none"> <li>You must not discriminate, intimidate, harass or abuse anyone because of their sexual orientation.</li> </ul> <p>The Gypsies and Travellers officer will continue to support Gypsies and Travellers who feel discriminated against due to their sexual orientation. We will work with STAG to address any issues.</p>
<p><b>Equality information on which above analysis is based</b></p>
<p>The Equalities and Human Rights Committee research report: “Inequalities experienced by Gypsy and Traveller Communities: A review” (2009)</p> <p>The council does not hold information on the sexual orientation of the travellers.</p> <p>According to the Equalities and Human Rights Commission, over half (51 per cent) of gay men, 61 per cent of lesbians and a quarter (25 per cent) of bisexual people felt that they had experienced disadvantage as a result of their sexual orientation.</p> <p>Analysis is also based on officer knowledge of residents of Southwark’s sites.</p>
<p><b>Mitigating actions to be taken</b></p>
<p>As part of the consultation process and in signing new agreements, we will improve our data held on sexual orientation across the sites.</p> <p>We will also maintain and/or improve the data held on sexual orientation through our tenancy checks programme.</p> <p>This data will inform future equality impact assessments, leading to better policy and decision making in relation to Gypsies and Travellers.</p>

<p><b>Human Rights</b></p>
<p><b>Possible impacts (positive and negative) of proposed policy/decision/business plan</b></p>
<p><b>Article 8 Human Rights Act 1998</b></p> <p>This Article prescribes that everyone has the right to respect for his private and family life, his home and his correspondence. No public authority may interfere this right (save in certain prescribed circumstances).</p> <p>The Act contains clear terms regarding the entry onto the pitch by the owner: the express terms make clear that staff working for utility companies who need to carry out essential repairs or emergency works should also be allowed access, on the terms set out in the Act. This preserves the need to balance continuity of essential services at the site (part of the owner’s statutory obligations) against the residents’ right to privacy.</p> <p>The previous draft of the agreement contained a number of clauses which restricted the residents’ activities on the site: these have been reviewed and, where they are not essential for the good management of the site, removed or amended. For example, clauses prohibiting the operation of a business at the site, taking in lodgers and the breeding of dogs have been</p>

removed or altered to allow the residents greater control over their occupancy of the site.

**Mitigating actions to be taken**

The Gypsies and Travellers officer and members of other council bodies are working hard to improve relationships between the residents and the council.

Through the consultation process and other communication methods the council is seeking to make clear that it will seek to protect and promote the residents' interests, and that its requirements for the use of the sites are reasonable and proportionate, having regard to the residents' particular needs.

If the residents are engaged with this process it should reduce the need for intrusion into the residents' lives.



### Section 3: Further actions and objectives

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#### 5. Further actions

Based on the initial analysis above, please detail the key areas identified as requiring more detailed analysis or key mitigating actions.

Number	Description of Issue	Action	Timeframe
1	The need to improve the data available to us to inform better decision making	Collect improved data on Gypsies and Travellers against the protected characteristics, where they agree to provide the information	Summer 2013 and ongoing
2	Ensure Gypsies and Travellers are supported to engage with housing Operations	Ensure notice boards are available on the site and that literature bears in mind the community's needs	Summer 2013
3	Work foster improved relationships with others for the Gypsy and Travellers community	Ensure we support the community, including working with partners to promote the community.	Ongoing

#### 5. Equality objectives (for business plans)

Based on the initial analysis above, please detail any equality objectives that you will set for your department/service.

**Not applicable as the EQIA only covers a new agreement and not a service.**

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