

# Cambridge City Council Equality Impact Assessment



Completing an Equality Impact Assessment will help you to think about what impact your strategy, policy, plan, project, contract or major change to your service may have on people that live in, work in or visit Cambridge, as well as on City Council staff.

The template is easy to use. You do not need to have specialist equalities knowledge to complete it. It asks you to make judgements based on evidence and experience. There are guidance notes on the intranet to help you. You can also get advice from Suzanne Goff, Strategy Officer on 01223 457174 or email [suzanne.goff@cambridge.gov.uk](mailto:suzanne.goff@cambridge.gov.uk) or from any member of the Joint Equalities Group.

## 1. Title of strategy, policy, plan, project, contract or major change to your service:

Use of body worn cameras by Public Realm Enforcement Officers (this encompasses the City Council's Public Realm Enforcement Officers (currently 6 FTE) and Dog Wardens (currently 2 FTE))

## 2. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

Body Worn Cameras (BWC) have routinely been in use to capture both video and audio information in the UK since 2006.

Studies have shown that the use of BWC reduces abuse (physical and verbal), that officers could be exposed to and it better enables officers to perform their roles by providing a contemporaneous, irrefutable record of events.

Whilst EOs, to date, have not been physically assaulted they are subjected to verbal abuse and aggressive behaviour frequently when issuing Fixed Penalty Notices (FPN's). It is estimated that approximately 75% of interactions involving the issuing of FPNs result in some degree of verbal abuse.

Enforcement Officers perform key functions in pursuit of the Council's aims for making Cambridge cleaner and greener, protecting the city's unique quality of life and making Cambridge safer. Through the work they undertake with environmental crime, such as enforcing against littering and the illegal dumping of waste these aims are achieved.

Enforcement Officer work involves regular and frequent contact with the general public and business stakeholders, usually in the context of enforcing environmental law. This results in a high level of exposure to potential confrontation. It is envisaged that when dealing with potentially volatile situations, behaviour is far less likely to escalate to be either physically or verbally abusive when a person is aware that they are being recorded.

BWC will also improve the quality of investigation in relation to complaints and challenges to enforcement work and ensure that high levels of customer service are being delivered.

**3. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick those that apply)**

- ☒ Residents  
☒ Visitors  
☒ Staff

A specific client group or groups (please state):

**4. What type of strategy, policy, plan, project, contract or major change to your service is this? (Please tick)**

- ☒ New  
☐ Revised  
☐ Existing

**5. Responsible directorate and service**

Directorate: Environment

Service: Streets and Open Spaces Operations

**6. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service?**

- ☒ No  
☐ Yes (please give details):

## 7. Potential impact

Please list and explain how this strategy, policy, plan, project, contract or major change to your service could **positively** or **negatively** affect individuals from the following equalities groups.

When answering this question, please think about:

- The results of relevant consultation that you or others have completed (for example with residents, people that work in or visit Cambridge, service users, staff or partner organisations).
- Complaints information.
- Performance information.
- Information about people using your service (for example whether people from certain equalities groups use the service more or less than others).
- Inspection results.
- Comparisons with other organisations.
- The implementation of your piece of work (don't just assess what you think the impact will be after you have completed your work, but also think about what steps you might have to take to make sure that the implementation of your work does not negatively impact on people from a particular equality group).
- The relevant premises involved.
- Your communications.
- National research (local information is not always available, particularly for some equalities groups, so use national research to provide evidence for your conclusions).

**(a) Age** (any group of people of a particular age, including younger and older people – in particular, please consider any safeguarding issues for children and vulnerable adults)

Data for this characteristic is not held.

**(b) Disability** (including people with a physical impairment, sensory impairment, learning disability, mental health problem or other condition which has an impact on their daily life)

Data for this characteristic is not held.

**(c) Gender**

Data for this characteristic is not held..

**(d) Pregnancy and maternity**

Data for this characteristic is not held..

**(e) Transgender** (including gender re-assignment)

Data for this characteristic is not held.

**(f) Marriage and Civil Partnership**

Data for this characteristic is not held.

**(g) Race or Ethnicity**

Data for this characteristic is not held.

**(h) Religion or Belief**

Data for this characteristic is not held.

**(i) Sexual Orientation**

Data for this characteristic is not held.

**(j) Other factors that may lead to inequality – in particular – please consider the impact of any changes on low income groups or those experiencing the impacts of poverty (please state):**

Data for any of the above characteristics is not held, so it is not possible to quantify / consider how specific groups might or might not be affected in Cambridge. The use of BWC is environmental crime incident specific and being adopted as a tool to support personal safety, and enforcement action. There is no adverse impact on Protected Groups from its adoption.

All enforcement action is undertaken in accordance with the council's [Corporate Enforcement Policy](#).

Whilst BWC technology is routinely used in environmental crime enforcement throughout the UK, it is recognised that there might be concerns regarding personal privacy issues, particularly as the device would not necessarily be identified as a camera from a distance. As such, the Information Commissioner's Office (ICO) recommends that a Privacy Impact Assessment (PIA) is completed to ensure compliance with the Data Protection Act 1998 (DPA). A PIA is a process which helps to anticipate and address likely impacts of a project, and to identify solutions to minimise the risk of personal intrusion. A PIA in respect of the introduction of this technology has been undertaken. The PIA will be continually updated to take into account operational changes that might emerge overtime.

The Code of Practice and Operational Procedure for the use of BWC must comply with the following legislation:

- Data Protection Act 1998, which regulates the processing of personal data.
- Freedom of Information Act 2000, which provides for a general right of access to information, which is not personal data held by public bodies.
- Human Rights Act 1998, Article 6 (right to a fair trial), which requires recordings that might have the potential to be used in court proceedings, to be safe guarded i.e. need an audit trail. Article 8 (right to respect for private life) requires that recordings, which may potentially be private, must not go beyond what is necessary.

All captured data will be processed to comply with the Data Protection Act 1998, and adherence to ICO guidance. The council recognises the risk of enforcement action, which could be taken under the Data Protection Act 1998 should any processing breach occur.

**8. If you have any additional comments please add them here**

All communication by the Streets and Open Spaces Operations team is undertaken in accordance with the Council's [Service Standards](#), which details what customers can expect of us.

## 9. Conclusions and Next Steps

- If you have not identified any negative impacts, please sign off this form.
- If you have identified potential negative actions, you must complete the action plan at the end of this document to set out how you propose to mitigate the impact. If you do not feel that the potential negative impact can be mitigated, you must complete question 8 to explain why that is the case.
- If there is insufficient evidence to say whether or not there is likely to be a negative impact, please complete the action plan setting out what additional information you need to gather to complete the assessment.

All completed Equality Impact Assessments must be emailed to Suzanne Goff, Strategy Officer, who will arrange for it to be published on the City Council's website.  
Email [suzanne.goff@cambridge.gov.uk](mailto:suzanne.goff@cambridge.gov.uk)

## 10. Sign off

Name and job title of assessment lead officer: Wendy Young, Operations Manager  
(Community Engagement and Enforcement)

Names and job titles of other assessment team members and people consulted:

Date of completion: 5 September 2016

Date of next review of the assessment:

## Action Plan

**Equality Impact Assessment title:**

**Date of completion:**

Equality Group	Age
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

Equality Group	Disability
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

Equality Group	Gender
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Pregnancy and Maternity</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Transgender</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Marriage and Civil Partnership</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Race or Ethnicity</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	



<b>Equality Group</b>	<b>Religion or Belief</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Equality Group</b>	<b>Sexual Orientation</b>
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

<b>Other factors that may lead to inequality</b>	
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	