

DBS Checks Appendix A

Equality Impact Assessment

For support in completing this EQIA, please consult the EQIA Guidance Document or contact equality@rbwm.gov.uk

1. Background Information

| | |
|--------------------------------|---|
| Title of policy/strategy/plan: | DBS Checks on RBWM Licenced Drivers |
| Service area: | Housing and Public Protection / Trading Standards & Licensing |
| Directorate: | Place |

Provide a brief explanation of the proposal:

- What are its intended outcomes?
- Who will deliver it?
- Is it a new proposal or a change to an existing one?

The proposal is to require all RBWM licenced hackney carriage and private hire drivers to enable the Licensing team to check their DBS every six months, with effect from 01 April 2024, in line with the requirements of a statutory standard

This will be achieved by requiring the drivers to sign up to the Disclosure and Barring Service (DBS) Update Service, and a "DBS Update Service Status Checks" facility provided by a third party company

This is a new proposal and will be delivered by the Trading Standards & Licensing Manager

2. Relevance Check

Is this proposal likely to directly impact people, communities or RBWM employees?

- If No, please explain why not, including how you've considered equality issues.
- Will this proposal need a EQIA at a later stage? (for example, for a forthcoming action plan)

Yes

If 'No', proceed to 'Sign off'. If unsure, please contact equality@rbwm.gov.uk

3. Evidence Gathering and Stakeholder Engagement

Who will be affected by this proposal?

For example, users of a particular service, residents of a geographical area, staff

The proposal will directly affect the approximately 1000 RBWM licenced hackney carriage and private hire drivers

Among those affected by the proposal, are protected characteristics (age, sex, disability, race, religion, sexual orientation, gender reassignment, pregnancy/maternity, marriage/civil partnership) disproportionately represented?

For example, compared to the general population do a higher proportion have disabilities?

Yes, the protected characteristics race and religion will be disproportionately represented by this proposal as a high percentage of RBWM licenced drivers are from ethnic minorities and from a particular religion

What engagement/consultation has been undertaken or planned?

- How has/will equality considerations be taken into account?
- Where known, what were the outcomes of this engagement?

A consultation has been carried out, with both the drivers and the wider public / community

This showed that a very large majority of respondents, 81.9%, said they know of no compelling reasons why RBWM should not implement the six monthly checks

What sources of data and evidence have been used in this assessment?

Please consult the Equalities Evidence Grid for relevant data. Examples of other possible sources of information are in the Guidance document.

The main source of information is the records held by RBWM Licensing which shows the high number of drivers affected being from ethnic minorities

4. Equality Analysis

Please detail, **using supporting evidence**:

- How the protected characteristics below might influence the needs and experiences of individuals, in relation to this proposal.
- How these characteristics might affect the impact of this proposal.

Tick positive/negative impact as appropriate. If there is no impact, or a neutral impact, state 'Not Applicable'

More information on each protected characteristic is provided in the Guidance document.

| | Details and supporting evidence | Potential positive impact | Potential negative impact |
|------------------------------|---|---------------------------|--|
| Age | | Not Applicable | Not Applicable |
| Disability | | Not Applicable | Not Applicable |
| Sex | | Not applicable | Not applicable |
| Race, ethnicity and religion | The decision not to bring in the six monthly DBS checks will have a disproportionate impact on drivers who are from ethnic minorities, and from a particular religion, because a high proportion of licenced drivers are from ethnic minorities and particular religions. | Not Applicable | The drivers who replied to the consultation mostly referred to extra costs and time that this would take, but this can be shown not to be the case, as set out in the report One person who replied said "all drivers who are mostly from an ethical (<i>sic</i>) background feel targeted and alienated" |

| | | | |
|--|--|----------------|----------------|
| Sexual orientation and gender reassignment | | Not Applicable | Not Applicable |
| Pregnancy and maternity | | Not Applicable | Not Applicable |
| Marriage and civil partnership | | Not Applicable | Not Applicable |
| Armed forces community | | Not Applicable | Not Applicable |
| Socio-economic considerations e.g. low income, poverty | | Not Applicable | Not Applicable |
| Children in care/Care leavers | | | |

5. Impact Assessment and Monitoring

If you have not identified any disproportionate impacts and the questions below are not applicable, leave them blank and proceed to Sign Off.

What measures have been taken to ensure that groups with protected characteristics are able to benefit from this change, or are not disadvantaged by it?

For example, adjustments needed to accommodate the needs of a particular group

As set out in the report, the costs to drivers will either be lower, or almost cost neutral, compared with current fees, depending on the length of their licence

All drivers will save substantially by moving to an on-line DBS process compared with both the old paper process, and to getting a new DBS on-line every six months

There will be a reduction in the admin that the drivers have to do and the time spent on the DBS process

The new process will apply to all drivers, not just those from a particular ethnic background, and not only to RBWM licenced drivers but to all licenced hackney carriage and private hire drivers across the country

Where a potential negative impact cannot be avoided, what measures have been put in place to mitigate or minimise this?

- For planned future actions, provide the name of the responsible individual and the target date for implementation.

N/A

How will the equality impacts identified here be monitored and reviewed in the future?

See guidance document for examples of appropriate stages to review an EQIA.

The impacts of the proposals have been shown not to be negative but there will be ongoing communication with the affected drivers to monitor the introduction of six monthly DBS checks and to deal with any problems that arise

6. Sign Off

| | |
|---------------------------------------|-------------------------|
| Completed by: Greg Nelson | Date: 18/01/2024 |
| Approved by: Ellen McManus-Fry | Date: 23/01/2024 |

If this version of the EQIA has been reviewed and/or updated:

| | |
|---------------------|--------------|
| Reviewed by: | Date: |
|---------------------|--------------|