

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socioeconomic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.



Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Anti-Social Behaviour Policy
Team/ Department	Housing, Regeneration and Development
Executive Director	Joanne Drew, Doug Wilkinson
Cabinet Member	Cllr George Savva - Cabinet Member for Social Housing Cllr Gina Needs - Cabinet Member for Safety and Cohesion
Author(s) name(s) and contact details	Ozlem Anderson Ozlem.anderson@enfield.gov.uk
Committee name and date of decision	Cabinet, 18th October 2023
Date of EqIA completion	28 th September 2023

Date the EqIA was reviewed by the	28th September 2023
Corporate Strategy Service	
Name of Head of Service responsible	Interim post
for implementing the EqIA actions (if	
any)	
Name of Director who has approved	Joanne Drew, Director of Housing and
the EqIA	Regeneration

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.



Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change? What are the reasons for the decision or change? What outcomes are you hoping to achieve from this change? Who will be impacted by the project or change - staff, service users, or the wider community?

We want all Enfield Council Housing residents to live peacefully within their homes without fear, intimidation, threats of harm, nuisance, or unreasonable behaviour from others. We have reviewed our Council Housing Anti-Social Behaviour (ASB) Policy and worked in partnership across council services to develop a new draft policy.

The policy sets out how we will work together across services and with external agencies to tackle and prevent ASB in and around our council housing homes and neighbourhoods. It explains what is and isn't considered ASB, the ways in which residents can report incidents of ASB, how contact will be made with them, how we will manage cases of ASB and how victims will be supported. The policy also clarifies types of ASB that fall into Priority 1 or Priority 2 and timeframes for responding.

The new draft policy has been developed around 12 service standards. Through this policy we will:

- 1. Meet the needs of our diverse communities through a fair and consistent approach
- 2. Make it easy to report ASB
- 3. Respond to cases by the agreed timeframe
- 4. Keep accurate records
- 5. Work with residents, partner services and agencies
- 6. Use mediation to stop cases escalating
- 7. Support victims and keep in touch throughout the case
- 8. Sustain tenancies wherever appropriate
- 9. Take enforcement action where necessary
- 10. Review cases where residents request this
- 11. Support and develop our workforce
- 12. Monitor our performance

The policy clarifies roles and responsibilities of the council in handling all reports of ASB and makes it easier for residents to understand what they can expect from the council once they have made an ASB report. It sets out how dedicated officers in our new ASB team will lead on cases and keep in contact with complainants,



updating them on progress throughout the duration of a case up to and after the closure of a case as agreed with the complainant at the beginning.

The policy introduces a set of performance indicators we will use to continuously monitor our performance and improve our service delivery.



Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

- 1. Age
- 2. Disability
- 3. Gender reassignment.
- 4. Marriage and civil partnership.
- 5. Pregnancy and maternity.
- 6. Race
- 7. Religion or belief.
- 8. Sex
- 9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

"Differential impact" means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available here. (link to guidance document once approved)



Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected. The ASB Policy is aimed at supporting all council housing residents with ASB concerns regardless of age.

According to the 2021 Census, Enfield's population in March 2021 was estimated to be 330,000 (rounded to the nearest hundred).¹ It is estimated to have increased by around 17,500 (or 5.6%) between 2011 and 2021.

Age breakdown of Enfield's population

Age group	Enfield population
0-4	21,300
5-9	22,800
10-14	24,100
15-19	21,300
20-24	19,100
25-29	21,200
30-34	23,100
35-39	24,000
40-44	24,600
45-49	22,700
50-54	22,700
55-59	21,100
60-64	17,100
65-69	12,800
70-74	11,200
75-79	8,200
80-84	6,500
85+	6,400

- Enfield has higher proportions of residents aged under 20 than regional and national averages.
- People aged 65 and over make up 13% of our population and this is forecasted to increase to 16% by 2030 – from 45,148 to 57,647².

¹ ONS, <u>Population and household estimates</u>, <u>England and Wales: Census 2021</u>



The following table shows the age breakdown of our council housing tenants:

Count of Tenancy Number	
Age Range	Total
18-24	225
25-34	739
35-44	1561
45-54	2283
55-64	2262
65+	2897
Not recorded	80
Grand Total	10047

- The majority of council housing tenants are aged 35 or over
- The largest group based on age are tenants aged 65 or over

Anyone of any age can experience or become the victim of anti-social behaviour. In 2022 there were 28.55 incidents of ASB per 1000 people nationally³:

- The annual Crime Survey for England and Wales estimated more than a third (37%) of adults experienced or witnessed anti-social behaviour (ASB) in their community in 2022 its highest level for six years⁴.
- Younger people (aged between 18 to 34) are more likely to feel a significant negative impact from ASB compared with other age groups overall according to national research⁵.

Perpetrators of anti-social behaviour

- Young people are known to be vulnerable to recruitment into gangs and exploitation which can lead to taking part in anti-social behaviour
- A report by the Joseph Rowntree Foundation (JRF) concludes that the general population tends to associate ASB with young people⁶

Reporting anti-social behaviour

The graph below shows the age profile of complainants of ASB compared to the known age profile of our council housing tenants in 2022/23. This data shows

² <u>https://data.london.gov.uk/dataset/projections</u>

³ https://crimerate.co.uk/anti-social-behaviour

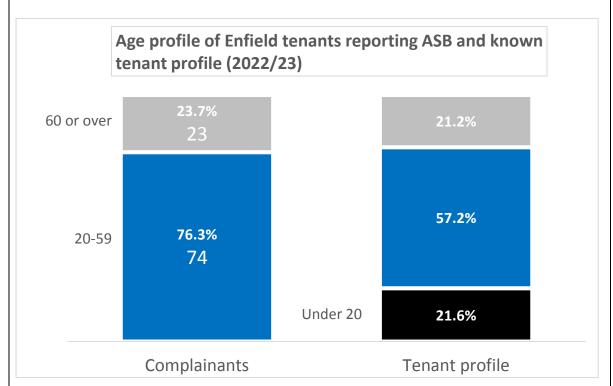
⁴ https://www.resolveuk.org.uk/the-hub/blog-and-articles/7-the-rise-of-antisocial-behaviour-can-we-stop-it

⁵ https://www.gov.uk/government/publications/impacts-of-anti-social-behaviour-on-individuals-and-communities

⁶ <u>Anti-social behaviour strategies: Finding a balance</u>



around three quarters of reports were from those aged 20-59. There were no reports from those aged under 20. NB The profile of complainants is based on a sample size of 97.



Our handling of anti-social behaviour:

- Our Resident Satisfaction Survey showed that older people are more satisfied with our response to ASB than younger people. Of those who responded, 32% of those aged 65 or over were satisfied with our handling of ASB compared to 23% of those aged between 16-34 and 27% of those aged 35-64.
- Implementation of our policy is expected to improve satisfaction with outcome scores across all age groups.

The policy will support all residents according to individual need.

Consultation analysis:

A 10-week consultation ran between July and September 2023. The consultation was published on our website, promoted at Customer Voice, shared with 8,101 council tenants and leaseholders and shared on our social media pages. There were 107 respondents who took part in our consultation. Of those, 68 agreed to share their protected characteristics, with 22 aged 30 - 49; 29 aged 50 -64; and 14 aged 65 and over.

Mitigating actions to be taken



Our policy is expected to have a positive impact on all residents regardless of age. We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected. Just under 48,000 Enfield residents (all ages) had a disability as at the 2011 Census. Later estimates from the 2021 Census indicate that, among working-age people (aged 16-64 years), 50,300 had some level of disability – around 23% of the working-age population

If correct, this represents an increase of nearly 100% on the Census estimates for this age group in 2011.

The Crime Survey for England and Wales 2019 reported that almost 1 in 4 (23.1%) disabled adults aged 16 years and over had experienced crime compared with 1 in 5 (20.7%) non-disabled adults⁷.

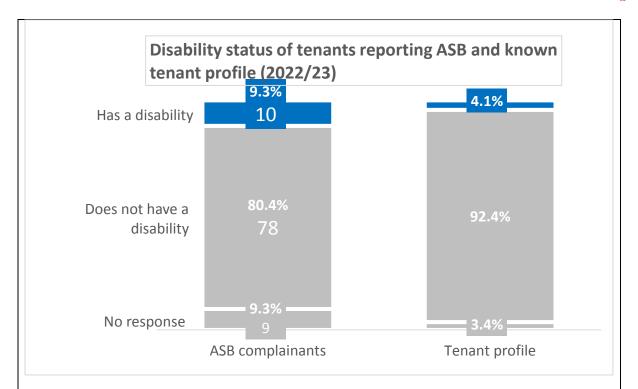
Government research also indicates that those with a pre-existing mental or physical condition are more likely to experience a significant impact of ASB (24%) than those without (21%).

Reporting of ASB:

Our data shows that there is an over representation of those with a disability among ASB complainants. It is important to note the sample size is small - we know the disability status of 88 out 97 complainants. However, this is supported by data from the ONS showing disabled people aged 16 years and over (43.4%) were significantly more likely to have experienced any ASB in the year ending March 2020 than non-disabled people (39%).

⁷ Ons.gov.uk





Consultation analysis:

There were 107 respondents who took part in our consultation. Of those, 68 agreed to share their protected characteristics and 40% of those reported having a physical or mental health condition lasting longer than 12 months.

When asked whether they agreed with our service standards, 74% of people with a physical or mental health condition agreed compared to 92% of those respondents without.

When asked about timeframes, 48% of respondents with a physical or mental health condition agreed with them compared to 67% without.

There was a small difference between respondents who reported a physical or mental health condition when asked whether they agreed with our categorisation of ASB compared to those not at 78% and 83% respectively.

Analysis of consultation results shows that the majority of respondents agree with the policy regardless of disability. We have found that a higher percentage of people who have a physical or mental health condition disagree with our timeframes compared to those without and we will use these findings to inform our policy and better support residents based on their individual needs.

The implementation of our policy is expected to have a positive impact on all residents including those who have a disability. The policy will support all residents according to individual need.



Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents including those with a disability. The new policy sets out a consistent and person-centred approach to managing all reports of ASB ensuring all complainants are treated equally and highlights interventions to reduce and prevent incidents of ASB for all council housing residents.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

The Census 2021 asked a voluntary question on gender identity to respondents aged 16 years or over - "Is the gender you identify with the same as your sex registered at birth?" and had of the option of selecting "Yes", or "No" and adding their gender identity.⁸

91.42% of Enfield residents aged 16 years and over responded to the question.

Gender identity	Enfield population aged 16 years and over	Percentage of residents aged 16 years and over
Gender identity the same as their sex registered at birth	232,329	90.34%
Gender identity different from their sex registered at birth but no specific identity	1,652	0.64%

⁸ ONS, <u>Gender identity, England and Wales: Census 2021</u>



given		
Trans woman	518	0.2%
Trans man	486	0.19%
Non-binary	74	0.03%
Another gender identity	58	0.02%
Did not answer	22,065	8.58%

Research suggests that some groups are specifically targeted as victims of hate crime on the basis of prejudice:

• Stonewall reports that two in five trans people (41 per cent) have experienced a hate crime or incident because of their gender identity in the last 12 months⁹.

The implementation of our policy is expected to have a positive impact on all residents regardless of gender identity. The policy will support all residents according to individual need.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of gender identity.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, whereas a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

The implementation of the ASB policy is expected to have a positive impact on all residents regardless of marital status. The policy will support all residents

⁹ LGBT in Britain - Hate Crime and Discrimination | Stonewall



according to individual need.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of marital status.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Pregnancy and maternity

Pregnancy refers to 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.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

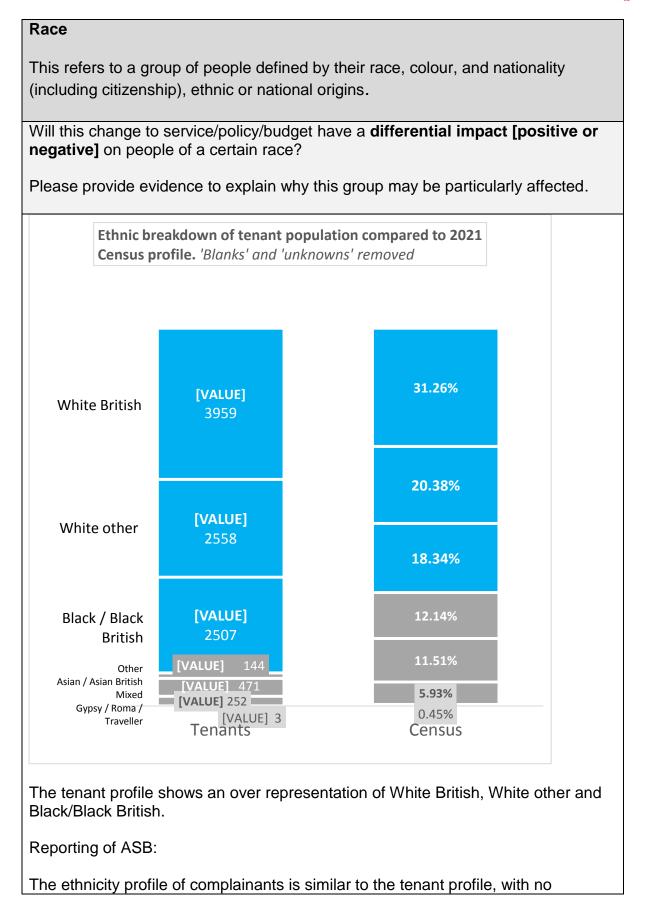
We do not hold local data regarding ASB victimisation based on this protected characteristic however it is likely that being pregnant or having young children will make people feel more vulnerable to the impacts of ASB.

The implementation of the ASB policy is expected to have a positive impact on all residents regardless of whether they are pregnant or have young children. The policy will support all residents according to individual need.

Mitigating actions to be taken

Our policy is expected to have a positive impact on pregnancy and maternity. We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.







substantial levels of over or under representation of ethnic groups as complainants

The implementation of the ASB policy is expected to have a positive impact on all residents regardless of ethnicity. The policy will support all residents according to individual need.

Consultation:

There were 107 respondents who took part in our consultation. Of those, 68 agreed to share their protected characteristics. Of this 68, 42 were White, 3 were Mixed; 3 were Asian and 9 were Afro-Caribbean.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of race.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). 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.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

The table below shows Enfield's religious profile¹⁰. This is broadly reflective of the religious profile of council housing tenants.

Religion	Proportion of Enfield population
Christian	46.4%
Buddhist	0.5%
Hindu	3.1%
Jewish	1.1%

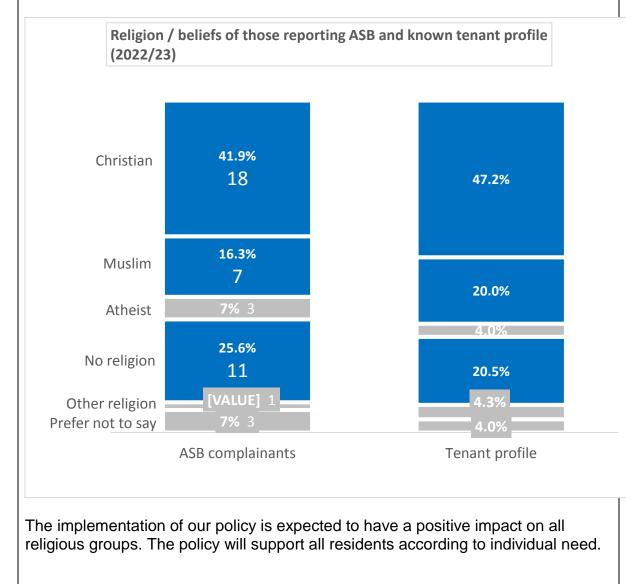
¹⁰ Census, 2021



Muslim	18.6%
Sikh	0.4%
Other religion	3.1%
No religion	19.8%
Religion not stated	7.0%

Reporting of ASB

The religious profile of ASB complainants broadly reflects the religious profile of tenants:



Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of religion.



We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Enfield's population is 52.3% female and 47.7% male¹¹. Enfield's tenant profile is 54.3% female and 45.7% male.

Reporting of ASB

In Enfield females are over-represented as complainants of ASB with 68% of complaints. NB this data is based on a small sample size of 96 complainants.

Government research suggests that men (25%) are more likely to report significant impacts from ASB compared to women $(15\%)^{12}$.

Consultation analysis

Of the 107 respondents to the consultation, 68 agreed to share their protected characteristics. Of those 68, 57% were female.

When asked whether they agreed with our categorisation of ASB 82% of female respondents who shared their protected characteristics agreed compared to 78% of male respondents.

When asked about timeframes 64% of female respondents agreed with them compared to 48% of male respondents.

85% of female respondents agreed with our service standards, the same as male respondents.

Analysis of the consultation shows that, based on this small sample, the majority of female respondents agree with the policy. We will use the results of the consultation to continue to inform the implementation of the policy ensuring all residents are treated fairly and their specific needs met.

¹¹ Enfield Council

¹² https://www.gov.uk/government/publications/impacts-of-anti-social-behaviour-on-individuals-and-communities



The implementation of our policy is expected to have a positive impact on both men and women. The policy will support all residents according to individual need.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all Enfield residents regardless of sex. The new policy sets out a consistent and person centred approach to managing all reports of ASB ensuring all complainants are treated equally and highlights interventions to reduce and prevent incidents of ASB for all council housing residents.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The Census 2021 included a voluntary question on sexual orientation for all respondents aged 16 and over.¹³ The response options were:

- Straight or heterosexual
- Gay or lesbian
- Bisexual
- Other sexual orientation (respondents were then asked to write in the sexual orientation with which they identified)

In Enfield, 90.3% of residents aged 16 and over responded to this question.

	16 years and over	Percentage of Enfield residents aged 16
		years and over

¹³ ONS, <u>Sexual orientation</u>, England and Wales: Census 2021



Straight or heterosexual	226,705	88.15%
Gay or lesbian	2,342	0.91%
Bisexual	2,073	0.81%
Pansexual	944	0.37%
Asexual	74	0.03%
Queer	35	0.01%
All other sexual	151	0.06%
orientations		
Not answered	24,858	9.67%

Our tenant profile based on 6,229 tenants:

Sexual orientation	Percentage of council housing tenants
Straight or heterosexual	89.1%
Gay or lesbian	0.4%
Bisexual	0.3%
Other	0.1%
Prefer not to say	10.1%

Reporting of ASB:

Our data on the sexuality of complainants is limited with only 40 out of 97 complainants completing this field. Of those 80% reported being straight or heterosexual and 20% preferred not to say.

Research shows that people can experience discrimination and become the victims of hate crime based on their sexual orientation:

- Stonewall reports one in five LGBT people have experienced a hate crime or incident because of their sexual orientation and/or gender identity in the last 12 months
- Four in five anti-LGBT hate crimes and incidents go unreported, with younger LGBT people particularly reluctant to go to the police

The implementation of our policy is expected to have a positive impact on all residents regardless of sexual orientation. The policy will support all residents according to individual need.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all Enfield residents regardless of sexual orientation.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to support them.

Socio-economic deprivation



This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Enfield is the 74th most deprived of 317 local authorities in England according to the Multiple Indices of Deprivation 2019 putting it amongst the 25% most deprived districts. Enfield's average deprivation score has not worsened since 2015, however levels of deprivation relative to other London boroughs has worsened. In 2015 Enfield was the 12th most deprived borough in London, in 2019 it was the 9th most deprived.¹⁴

According to the Census 2021, 10% of households in Enfield live in local authority owned properties and 7% live in registered provider homes.¹⁵

The Government analysis from the report **Anti-social behaviour: impacts on individuals and local communities** found that London residents experienced greater ASB impacts than those living in other regions across England. The analysis found that 29% of respondents who lived in London felt a significant impact on their quality of life from ASB (compared with 21% overall respondents). Qualitative interviews suggested that this could be a result of higher population density, with closer proximity to neighbours, making incidents of ASB more difficult to avoid. The analysis also suggests that the level of deprivation in a specific area seems to influence the prevalence of ASB there. Those residing in the most deprived areas (according to the Index of Multiple Deprivation) are more likely to have personally experienced or witnessed ASB in the last 12 months People in these same areas were also more likely to have experienced a significant impact from ASB on their quality of life compared to those who lived in the least deprived areas.

The implementation of our policy is expected to have a positive impact on all residents regardless of socio-economic status. The policy will support all residents according to individual need.

Mitigating actions to be taken.

Our policy is expected to positively impact all residents including those experiencing socio-economic disadvantage.

We are now collecting equalities data through referral forms when ASB is reported in order to enable us to better understand impact on protected groups and how to

¹⁴ Indices of Deprivation, 2019

¹⁵ ONS, <u>Housing, England and Wales: Census 2021</u>



support them.



Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The policy will be monitored through the following performance indicators collected quarterly and annually:

- Total number of nuisance complaints made in month
- Total number of priority 1 cases acknowledged within 3 days
- Anti-Social Behaviour Cases Relative to the Size of the Landlord
- Number of complaints relating to anti-social behaviour, relative to the size of the landlord
- Tenant satisfaction with landlord's handling of anti-social behaviour (annual survey)
- Total number of active ASB cases (P1 and P2)
- Total number of active P1 ASB cases
- Total number of active P2 ASB cases
- Number of ASB cases opened in month
- Number of ASB cases closed in month
- Percentage of residents satisfied with how ASB was handled (survey used on case closure)
- Percentage of residents satisfied with the outcome of their ASB case (survey used on case closure)
- Percentage of cases we have kept in contact with as agreed with the victim (survey used on case closure)

The council housing service will review performance against our targets to inform service improvement.

Satisfaction on our handling of ASB will be analysed for different protected groups so that we continue to analyse any difference in satisfaction between groups who share a protected characteristic and those who do not, and act on any findings so that we are always working to deliver inclusive and non-discriminatory services.

We will also analyse the percentage of complainants by protected characteristic annually to analyse whether there is an over or under reporting by any particular groups, and act on any findings so that we are always working to deliver inclusive and non-discriminatory services.

