



City of Westminster

EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

- The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

<https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx>

An EIA e-learning module is available for all Westminster staff:

www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by **2 September 2016**.

Title
8.4A : Service Proposals to stop providing Out of School Play & Childcare service
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? • In what context will it operate? • Who is it intended to benefit? • What results are intended? • Why is it needed?
<ul style="list-style-type: none"> • What is the project, policy or proposal? <p>This report considers the potential impact to service users of the Council's decision to give responsibility for the commissioning and delivery of out of school holiday and term time play and childcare services to schools and PVI sector providers; and the resulting closure of the council run Play Service once the new provider Fit for Sport (FFS) took over the management and delivery of out of school term time and holiday play and childcare provision within the borough on 31st May 2016.</p> <p>It gives regard to the extent to which these changes have impacted so far upon people with protected characteristics. Where a negative impact is identified it considers whether there is action that could be taken to mitigate this impact.</p> <p>The Equality Impact implication for staff was considered during the staff consultation process. This Equality Impact Assessment has been updated on conclusion of the consultation.</p> <p>The impact assessment has been reviewed and refined throughout the development and implementation phase of the new provision and the Council continues to work with the new provider to address issues that may have an impact upon children and families with protected characteristic; this will remain a continuous process throughout 2016-17 at which point it is anticipated that the new provider will have embedded a service provision that meets local community needs.</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? <p>In response to the Westminster Council decision to cease direct delivery of Out of School Play and Childcare service, it was agreed that:</p> <p>(a) The council gives responsibility for the commissioning and delivery of Out of school holiday and term time services to schools and third sector providers with effect from May 2016.</p> <p>(b) The in-house service ceased provision with effect from 27th May 2016.</p> <p>(c) Schools would either directly manage and deliver out of school play and childcare or would deliver the provision through FFS.</p> <p>(d) School Governing bodies have taken the lead responsibility in agreeing the organisation of the future term-time provision from their sites.</p> <p>(f) The arrangements around concessionary rates subsidised by the council for families on low incomes have changed. Following a review of targeted places in Spring 2016, targeted places for vulnerable children, are now sourced as required through spot purchase arrangements by Children services or through use of school's pupil premium funding. In addition FFS are working with Head teachers to ensure there are sufficient concessionary places available to vulnerable children and families within</p>

their local population.

The key stakeholders are:

- (1) Service users - Primary school age children and parent /carers.
- (2) Primary schools in Westminster.
- (3) Service staff (until May 2016).

- **In what context does it operate?**

The Early Help Strategy 2014 – 2018 sets out the priority outcomes that Westminster is focused upon achieving with its children and families. This strategy was signed off by full council in February 2015.

The Strategy establishes the framework that has been used to develop and deliver targeted provision. One of the Strategy's key objectives is to 'revise our service model of investment in universal services together with our key partners in line with our priority outcomes, in particular in respect of Play, Children's Centres and Youth Services.'

The Council has a statutory duty to continue to meet sufficiency in relation to childcare provision (Childcare Act 2016). This can be met either directly, or by supporting the market or schools to deliver childcare within the Borough through effective capacity building.

- **What results are intended?**

The new service model allows schools to develop and build upon existing school based after school and wrap around provision used by parents as alternatives to the in-house Play Service.

This approach supports the Council in meeting the sufficiency obligations for primary school age children under the Childcare Act (2006) whilst ensuring there is no future call on local authority funding. Any services obtained will also support schools in meeting their requirements under the Government's Extended Schools offer in response to local demand.

- **Why is it needed?**

Both to deliver savings in line with the council's budget setting process but also to improve outcomes as schools are well placed to provide this provision.

The strategy has delivered a model that enables the council to give responsibility for childcare and play to schools and third party providers.

- **Who is it intended to benefit and how?**

Access to high quality and sustainable childcare for primary school age children is key to supporting people into/and remaining in employment and training. It is also important as an additional support option for those families, where the informal support network of extended family or friends is not available.

At the time of the initial impact assessment there were up to 634 primary school age children using the service on a weekly basis and benefitting from the availability of childcare as part of an extended school offer across the 20+ schools.

The range of needs and support required by families has been further defined and has been tested as part of a school survey exercise during the Autumn term.

Further work around charging thresholds for low income working families and income maximisation has been undertaken and is on-going.

The provision of targeted places to children meeting a statutory threshold for intervention (either children in need, subject to a child protection plan or looked after) is now considered on a case by case basis, and funded by either the school or the council where this is assessed as best meeting the family support needs.

- **Who, potentially, could this project, policy or proposal have a detrimental effect on, and how?**

The Council's decision to stop providing out of school play and childcare services changes the level of provision available for those children and families accessing the service through a targeted / concessionary place prior to May 2016. The intention was following the provision closing, that those children requiring targeted support would either need to be funded by schools through pupil premium, or Family Services where the allocated Social Worker has identified the support as part of a specific package of support.

In January 2016 it had been identified that children and families accessing the hub site at Sussex Street may be impacted negatively should the site not be available beyond May 2016. However, Children's Services were able to gain approval from Corporate Property for the continued use of the site for a period of up to 2 years. In addition since FFS have taken over the management and delivery of the provision they have been in discussions with Westminster Cathedral School who have agreed for the provision to relocate to their school site as of September 2016; the walking bus provision from existing schools requiring the provision will remain.

Details of the lead person completing the screening/EIA

- (i) Full Name: Jayne Vertkin
- (ii) Position: Head of Early Help
- (iii) Unit: Childrens Services
- (iii) Contact Details: jvertkin@westminster.gov.uk

Date sent to Equalities@westminster.gov.uk

28th September 2016

Version number and date of update

V1.0 – 28th September 2016

SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1	Does the project, policy or proposal have the potential to disproportionately impact on any of the following groups? If so, is the impact positive or negative?			
	None	Positive	Negative	Not sure
Disabled people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Particular ethnic groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Men or women (include impacts due to pregnancy/ maternity)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People or particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People in particular age groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Groups with particular faiths and beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?	No	<input type="checkbox"/>	<input type="checkbox"/>	
If the answer is “negative” or “unclear” consider doing a full EIA				
1.2	What do you think that the overall NEGATIVE impact on groups and communities will be?			

None/ Minimal	Significant
<input type="checkbox"/>	<input checked="" type="checkbox"/>
None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups.	Significant impact would be where there is an impact is identified that has substantial impact on any groups.
If the answer is “significant” consider doing a full EIA	
1.3	Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
1.4	How have you come to this decision?
	<p>The new service provision that is being delivered by schools and FFS has not changed the criteria on which the service can be accessed.</p> <p>Several schools indicated that they were actively considering the potential for an extended offer under new arrangements to include pre-school age children, and homework support for parents. This would be an enhanced offer to current provision, therefore the impact was considered to be positive with the potential for additional support and activities under the new service model.</p> <p>The expectation was that, schools and third sector provider – Fit for Sport - would be able to determine the fee levels, however, schools indicated that they were keen to ensure fees remained competitive and affordable for their school population; and also to ensure sufficient take up and sustainability. Selection criteria which were used to select the current provider included an affordability element to ensure existing service users of the Play Service continued to be able to access service provision.</p> <p>For the two council owned community sites at Sussex Street and Bayswater the provision and delivery of childcare services was agreed through lease arrangements with the provider – Fit for Sport. They have complete control of fee levels however; and whilst they will need to ensure they remain competitive to ensure they build a sustainable provision there is a risk that they could increase fees which would have a negative impact on low income families and single parent families.</p> <p>The proposals have had a negative impact upon the workforce as they were served with redundancy notices. Affected staff were all offered re-deployment opportunities within the council alongside outplacement support before redundancy notices were served.</p>

2.1	Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal <ul style="list-style-type: none"> <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> <i>A baseline of data is available here</i> 	
	<p>How many people use the service currently? What is this as a % of Westminster's population?</p>	<p>FFS have not yet collected sufficient data to analyse the impact on protected groups since they have taken over the management and delivery of provision. It is anticipated the impact analysis will be refreshed during final quarter of 2016-17 - using data provided by FFS.</p>
	<p>Age</p>	<p>The age range for this service provision is for those children aged 4/5 in reception class to rising 11 year olds in Year 6. This age criteria will continue under any new arrangements linked to primary school populations.</p> <p>Ofsted requirements define the differing staffing levels for service provision to children under and over 8 year olds. As this will continue to be a requirement under registration obligations of any new provider, there is no anticipated impact from the proposed changes.</p> <p>The changes to this provision for this age group will also be considered as part of the wider Early Help strategic transformation planning. Should 5-11 year olds be found to be disproportionately affected by spending decisions as part of the wider council efficiencies planning, then mitigating action will be considered at that point.</p> <p>Parents of working age will continue to benefit from the availability of alternative provision facilitated by schools and council lease arrangements.</p>
	<p>Disability</p>	<p>The service does not deliver a service to any disabled children. This is due to there being a separate contracted provision available through Westminster Society based in the North East Locality.</p> <p>New provision is required contractually to support and reflect the local school population, Any additional support needs will be identified through EHC assessment and planning, and therefore provide additional support to enable any disabled child attending mainstream education to attend the new services.</p> <p>The range of needs and support required, was defined as part of the survey of parents for each school, and further considered based on school knowledge of SEN children on the school role.</p>

	<p>In addition the play and childcare needs of disabled children will form part of the re-commissioning of the specialist play service based in the North East in Lisson Green during 2016.</p> <p>It is considered that any change to service provider will not disproportionately impact on disabled parents, as the intention is to signpost to alternative services in the same locality as current provision.</p>
Gender	<p>No negative impact was identified from a gender perspective as the criteria for accessing the service provision has remain unchanged and continues to be a provision that encourages access by children of any genders.</p> <p>Parents of service users have experienced a change in provider for both term time and holiday out of school childcare and this from a practical perspective this has involved a new registration and communication process with FFS. However, schools have all incorporated a mobilisation phase for FFS that included meeting with service users.</p> <p>In relation to the potential risk of fee increases schools have all indicated that they are keen to ensure fees remain competitive and affordable for their school population and children accessing provision through the walking bus provision. In addition, since FFS have mobilised individual schools such as Essendine have arranged for additional concessionary places to be made available through FFS at their school sites. Similarly, St Peter's Eaton Square and Churchill Gardens have offered their own provision since May 2016 when the Play Service closed.</p>
Race	<p>It is considered that the changes to service provider will not disproportionately impact on one ethnic group more than another, as FFS operate a policy of inclusion. This characteristic has not been identified as needing attention or further consideration as a result of the changes to the service.</p>
Religion or belief	<p>It is considered that the changes to service provider will not disproportionately impact on one religious/belief group more than another, as all providers will be expected to operate a policy of inclusion.</p>
Sexual orientation	<p>This characteristic has not been identified as needing attention with regards impact from these recommendations</p>

	Human Rights or Children's Rights	<p>It is considered that there is no impact on Human Rights from the changes to after-school and holiday play service provision.</p> <p>With regards Children's rights, given the statutory requirement to ensure adequate access and sufficiency of childcare in an area, the council is supporting schools and FFS to ensure the availability of alternative provision for families where required.</p> <p>This continues to be managed through:</p> <ul style="list-style-type: none"> • Supporting schools and FFS to transfer existing and new service users to the new provision as appropriate • Signposting families to alternative local provision options to enable choice • Improving directory of services available through FIS to inform parents of range of family support available including child minders.
2.2	<p><i>Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.</i></p>	
	<p>The in-house Play Service did not collect equalities data therefore it has not been possible to monitor the impact upon any particular groups. FFS have not yet collected sufficient data to analyse the impact on protected; it is anticipated the impact analysis will be refreshed during final quarter of 2016-17 - using data provided by FFS.</p>	
2.3	<p><i>Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i></p>	
	<p>As above.</p>	

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

3.1	Consultation Information <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i>
	<p>1. Public consultation:</p> <p>On 14 February 2015, Cabinet agreed proposals which would form the basis of a consultation with parents, providers and the wider community. Whilst acknowledging the intention to transfer responsibility for the organisation of a service, the Council wished to consult with families and key stakeholders about the potential enhancements to the locality model. The objective was to reconsider the core purpose and delivery offer, in order to demonstrate that families, especially the most deprived, would still be reached effectively.</p> <p>The public consultation ran over 2 weeks from January-February 2015, as part of a wider consultation and engagement strategy on Early Help Service in Westminster.</p> <p>The Council conducted 6 Information events, and both online and paper surveys. These were promoted by writing to all service users inviting them to events in their areas, in order to comment on the proposed changes.</p> <p>The online survey received over 300 visits and 40 responses, and the information events across 6 sites attracted 134 attendees. Respondents to the survey cited the low cost of attending current provision (74%), the consistency of staffing (64%) and the quality of the sessions (54%) as the aspects of the services that they wanted to be retained following any reorganisation of provision.</p> <p>2. Staff Consultation</p> <p>Staff consultation was conducted from 16 November 2015 – 4 January 2016, and the feedback from that process was used to inform the final service specification and the final award of the provider. As part of the consultation process staff were also provided with the opportunity to offer an alternative service delivery option, however this was not taken up.</p> <p>3. School Engagement</p> <p>School Head teachers and governors from the existing host sites were fully engaged in planning the current service model, in order to achieve an alternative provision from their sites where required. They were committed to ensuring that the provision remained affordable for parents wishing to use the service, and have been working with FFS to ensure they reflect those principles in their business planning.</p> <p>The arrangements around concessionary rates subsidised by the council for families on low incomes have now changed. FFS offer a number of concessionary places at each school site, in addition, schools can increase the number of concessionary places available through the use of pupil premium (which has been the case at Essendine) or social work teams can spot purchase targeted places for CIN funded through Children services.</p> <p>4. Ofsted</p>

	<p>Any new service provider will be required to maintain and exceed the quality standards as required by Ofsted.</p> <p>The council has worked closely with FFS to ensure all Ofsted requirements are met and the provision delivered maintains and exceeds Ofsted requirements.</p>
<p>3.2</p>	<p>What might the potential impact on individuals or groups be? <i>Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups</i></p>
	<p>This will be reviewed and the EIA refreshed during the final quarter of 2016-17 using service data collected from the new service provider</p> <p>By this time there should be sufficient data to make a meaningful comparison of impact and the potential equality impacts on population groups between the old service and the new service provider.</p>

SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an impact, what can be done to reduce or mitigate the impact? (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).	
	Column A – Issues or barriers, things to take into account	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).
	Availability of Sussex Street site beyond April 2016 still to be confirmed	Action: Children’s Services Directorate are working with Corporate Property to confirm investment and availability for the continued use of the site until longer term property plans have been mobilised. Outcome: Corporate Property agreed to the continued use of Sussex Street under a lease arrangement for a period of up to 2 years. FFS have been delivering services from the site since May 2016, however due to the limited capacity of the site under Ofsted regulations FFS have had agreement from Westminster Cathedral School that their school site can be used as a hub site from September 2016. The current walking bus arrangements from existing schools requiring the service will continue.
	Lack of equalities data collation	Action: Service application form to be modified to include protected characteristics. Outcome: The Play Service registration form was not updated so there is limited equalities data available. However, FFS will be collating equalities data with a view this can be reviewed and any identified equalities issues can then be responded to. Initial data from FFS should be available to review in the final quarter 2016-17.
	Impact of change to concessionary criteria	Action: All families in receipt of concessionary places and who continued to meet the criteria for a targeted place were reviewed by FFS. Outcome: Families to receive support as required through spot purchase arrangements through Children’s Services and School’s use of Pupil Premium. To be reviewed in final quarter 2016-17.
	Incomplete Directory of wider childcare services within the borough	FIS is being updated and migrated to a new platform as part of the wider early help service re – design which will provide greater functionality and allow providers to update their own information more effectively thereby improving information available to users – effective from October 2016

4.2	Now that you have considered the potential or actual effect on equality, what action are you taking?													
	<table border="1"> <tr> <td data-bbox="247 376 357 530"><input type="checkbox"/></td> <td data-bbox="357 376 692 530">1. No major change (no impacts identified)</td> </tr> <tr> <td data-bbox="247 530 357 607"><input type="checkbox"/></td> <td data-bbox="357 530 692 607">2. Adjust the policy</td> </tr> <tr> <td data-bbox="247 607 357 730"><input checked="" type="checkbox"/></td> <td data-bbox="357 607 692 730">3. Continue the policy (impacts identified)</td> </tr> <tr> <td data-bbox="247 730 357 806"><input type="checkbox"/></td> <td data-bbox="357 730 692 806">4. Stop and remove the policy</td> </tr> </table>	<input type="checkbox"/>	1. No major change (no impacts identified)	<input type="checkbox"/>	2. Adjust the policy	<input checked="" type="checkbox"/>	3. Continue the policy (impacts identified)	<input type="checkbox"/>	4. Stop and remove the policy	<table border="1"> <tr> <td data-bbox="705 376 1517 530">Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.</td> </tr> <tr> <td data-bbox="705 530 1517 607">You will take steps to remove barriers or to better advance equality.</td> </tr> <tr> <td data-bbox="705 607 1517 730">You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.</td> </tr> <tr> <td data-bbox="705 730 1517 806">There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.</td> </tr> </table>	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.	You will take steps to remove barriers or to better advance equality.	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.
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4.3	Please document the reasons for your decision													
	<p>The impact of the project proposals have been regularly reviewed through a Project Board which meets on a monthly basis. In addition, until July 2016 a communications strategy was in place to ensure key stakeholders are kept informed and updated, and also to address and respond to any issued and concerns identified by service users and staff.</p> <p>The need to make savings in response to significant reductions in budget from central government means that the funding the Council receives from the Government is reducing and the Council has to save £100m over the next five years. To meet this challenge, Children’s Services has reviewed and reprioritised all their services, to look at what the Council should provide and what can be better provided elsewhere.</p>													

SECTION 5: ACTION PLAN

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

<p>5.1</p> <p>Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.</p> <p><i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i></p> <p>NB. Add any additional rows, if required.</p>							
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	To review service activity data from new service provider to asses impact of new model on groups outlined in earlier sections	Disabled children Families on low incomes Ethnic minority families Faith groups Vulnerable families	To asses if the new provider and service arrangements continue to allow equality of access and to set refreshed targets and revise the service specification if required	Input from head of service and tri borough commissioning team	Jayne Vertkin Sarah Bright	March 2017	amber

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME:

UNIT:

EMAIL & TELEPHONE EXT:

DATE (DD/MM/YYYY):

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by 2 September 2016.

All completed EIAs should be sent to: Equalities@westminster.gov.uk