

Equality Impact Assessment (EIA)

Document control

Title of activity:	Reducing Reoffending Strategy EIA
Type of activity:	Strategy
Lead officer:	Chris Stannett, Integrated Offender Management (IOM) Lead, Community Safety and Development team
Approved by:	Diane Egan, Community Safety and Development Manager, Corporate Policy
Date completed:	04/10/16
Scheduled date for review:	04/10/2020

The Corporate Policy & Diversity team requires **5 working days** to provide advice on EIAs.

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the Equality Act 2010 and the Public Sector Equality Duty.

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@havering.gov.uk

About your activity

1	Title of activity	Reducing Reoffending Strategy	
2	Type of activity	Strategy	
3	Scope of activity	The Reducing Re-offending Strategy is the response of the Havering Community Safety Partnership to national and regional initiatives to reduce levels of re-offending among those in contact with the criminal justice system,	
4a	Is the activity new or changing?	new	
4b	Is the activity likely to have an impact on individuals or groups?	Yes – Offenders and safer communities	
5	If you answered yes:	Please complete the EIA on the next page.	
6	If you answered no:	Please provide a clear and robust explanation on why your activity does not require an EIA. This is essential in case the activity is challenged under the Equality Act 2010. Please keep this checklist for your audit trail.	

Completed by:	Chris Stannett, Integrated Offender Management (IOM) Lead, Community Safety and Development team
Date:	04/10/16

2. Equality Impact Assessment

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the Equality Act 2010 and the Public Sector Equality Duty.

For more details on the Council's 'Fair to All' approach to equality and diversity, please visit our <u>Equality and Diversity Intranet pages</u>. For any additional advice, please contact <u>diversity@havering.gov.uk</u>

Please note the Corporate Policy & Diversity Team require <u>5 working days</u> to provide advice on Equality Impact Assessments.

Please note that EIAs are public documents and must be made available on the Council's <u>EIA webpage</u>.

Understanding the different needs of individuals and groups who use or deliver your service

In this section you will need to assess the impact (positive, neutral or negative) of your activity on individuals and groups with **protected characteristics** (this includes staff delivering your activity).

Currently there are **nine** protected characteristics (previously known as 'equality groups' or 'equality strands'): age, disability, sex/gender, ethnicity/race, religion/faith, sexual orientation, gender reassignment, marriage/civil partnership, and pregnancy/maternity/paternity.

In addition to this, you should also consider **socio-economic status** as a protected characteristic, and the impact of your activity on individuals and groups that might be disadvantaged in this regard (e.g. carers, low income households, looked after children and other vulnerable children, families and adults).

When assessing the impact, please consider and note how your activity contributes to the Council's **Public Sector Equality Duty** and its three aims to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity, and
- foster good relations between people with different protected characteristics.

Guidance on how to undertake an EIA for a protected characteristic can be found on the next page.

Guidance on undertaking an EIA

Example: Background/context

In this section you will need to add the background/context of your activity. Make sure you include the scope and intended outcomes of the activity being assessed; and highlight any proposed changes.

*Expand box as required

Example: Protect	Example: Protected characteristic		
Please tick (✓) the relevant box:	Overall impact: In this section you will need to consider and note what impact your activity will have on individuals and groups (including staff)		
Positive	with protected characteristics based on the data and information you have. You should note whether this is a positive, neutral or negative impact.		
Neutral	It is essential that you note all negative impacts. This will demonstrate that you have paid 'due regard' to the Public Sector		
Negative	Equality Duty if your activity is challenged under the Equality Act. *Expand box as required		

Evidence: In this section you will need to document the evidence that you have used to assess the impact of your activity.

When assessing the impact, please consider and note how your activity contributes to the three aims of the Public Sector Equality Duty (PSED) as stated in the section above.

It is essential that you note the full impact of your activity, so you can demonstrate that you have fully considered the equality implications and have paid 'due regard' to the PSED should the Council be challenged.

- If you have identified a **positive impact**, please note this.
- If you think there is a **neutral impact** or the impact is not known, please provide a full reason why this is the case.
- If you have identified a **negative impact**, please note what steps you will take to mitigate this impact. If you are unable to take any mitigating steps, please provide a full reason why. All negative impacts that have mitigating actions must be recorded in the **Action Plan**.

*Expand box as required

Sources used: In this section you should list all sources of the evidence you used to assess the impact of your activity. This can include:

- Service specific data
- Population, demographic and socio-economic data

Suggested sources include:

- Service user monitoring data that your service collects
- Havering Data Intelligence Hub
- London Datastore
- Office for National Statistics (ONS)

If you do not have any relevant data, please provide the reason why.

The EIA

Background/context:

The Council understands that barriers to opportunity can also lead to anti-social and offending behaviour, By addressing the needs of ex-offenders, it is hoped to reduce repeat incidences of offending behaviour and thereby improve the community environment.

The Reducing Re-offending Strategy is the response of the local authority to national and regional initiatives to reduce levels of re-offending among those in contact with the criminal justice system,

Havering has aligned its aims with those set out by the Ministry of Justice successive consultations on reoffending and rehabilitation (Breaking the Cycle 2010, Punishment and Reform 2012 and Transforming Rehabilitation 2013), and the National Offender Management Service (NOMS) priorities, which are to support the justice system and prevent victimisation through reducing reoffending.

The vision for the Councils reoffending strategy is to ensure that every ex-offender in or returning to the Borough receives the right services.

The strategy seeks to facilitate a reduction in re-offending at a local level by drawing together and building on the knowledge and expertise of the many agencies already engaged in resettlement work. It strives to promote innovation, highlight examples of good practice and identify areas for development. Its key theme is 'addressing need through partnerships' The aims of this strategy are

- Information and intelligence development develop and drive a consistent approach across
 agencies to information sharing and assessment and management of offenders in Havering.
 The outcome is improved efficiency by joining up the way local areas respond to offending.
- Supporting offenders (rehabilitation and reform) support a consistent approach to recognising and commissioning what works in supporting the criminogenic needs of offenders, rehabilitation and reform. The outcome being to prevent reoffending.
- Enforcement and compliance support a targeted enforcement approach which should aim to deliver swift and sure justice to the most harmful offenders who are unwilling to engage and who show no signs of motivation to change.

The strategy has several work streams these are outlined below: Each work stream has specific activity and targets which are influenced by the specific needs of the offender (this is inclusive of any diversity needs).

- Accommodation
- Education, training and employment
- Drugs and alcohol
- · Finance, debt and benefit

The delivery and coordination of the Reducing Re-offending strategy is overseen by the Reducing Re-offending Group . This group is chaired by the Assistant Chief Officer of the National Probation Service.

There are a range of agencies involved in the delivery of the Strategy, specifically:

- National Probation Service
- Community Rehabilitation Company
- Police

- London Borough of Havering
- Family Mosaic
- Public Health
- Bass Hostel
- Mental Health Services
- Westminster Drugs Project
- Department Work Pensions
- Education/ Pupil Referral Units

Age: Consider the full range of age groups			
Please tick (,	Overall impact:	
the relevant l	box:	Probation services have recognised that offenders needs will vary according	
Positive	✓	to age. An 18 year old offender will have completely different needs to that of a 65 year old offender. As a result the London Community Rehabilitation	
Neutral		Company have taken this into consideration and created a new cohort model that is reflective of an offender's age. The cohorts which take account of age are:	
Negative		 18-25 year old males – more specific focus on the transition from Youth to Adult and sourcing education and training opportunities for younger offenders 26-49 Year old males – This cohort is also known as the working age male cohort. It specifically looks at the skills of the offender and tries to get them into Employment. Males 50+ - Focused work around entrenched re-offending In Havering there appears to be higher representation (compared to other London Boroughs) in terms of young offenders between the 21- 25 year olds. This is also mirrored within the local Havering Integrated Offender Management (IOM) cohort where approximately 40% of the cohort are aged 18-25 years old. As a result the IOM Panel is chaired by the Probation 18-25 cohort Senior Probation Officer (SPO) in order to reflect this. 	

Highlighted in the Adult Offender Profile and reflected in the Reducing Reoffending Strategy, there are several key offender needs appearing which cross all the age groups. This includes:

- Accommodation
- Education training and employment
- Debt and financial issues
- Drugs and alcohol/

Addressing the above needs will be a key for aiding the resettlement and reintegration of offenders back into society. Any further interventions required for offenders relating to their age, will be highlighted through probations assessment process and addressed in their bespoke supervision sessions.

*Expand box as required

Evidence:

- Suspect data for Havering shows that the 18-25 age group are most over-represented in terms
 of offending. Rates of offending rise rapidly from 14 upwards before taking a steady decline
 from 25 upwards
- Numerically, 26-34 and 35-49 male age groups have seen the largest increase in number of assessments in 2014.(Compared to the year before)
- There were 40 offenders aged 18-20 assessed, whereas the Metropolitan Police accused 398 18-20 year olds of crimes during the same period (indicating that just 10% of 18-20 year old offenders were known to NPS/CRC in 2014).
- Most offenders assessed were aged 26-49 (64%). Havering had amongst the lowest representation of all London boroughs for offenders aged 18-20, whereas there was a higher representation for 21-25 year olds.

*Expand box as required

Sources used:

Havering Adult Offender Profile http://www.londoncrc.org.uk/

Disability: progressive		der the full range of disabilities; including physical mental, sensory and itions
Please tick (Overall impact:
the relevant	,	Due to recent restructures within the Probation Service and the Community
Positive		Rehabilitation company not all information around disability has been available. Going forward we have been informed that this information should
Neutral	(r)	be accessible. It must be noted that this information is very subjective and only given on a voluntary basis. Many individuals with disabilities do not see
Negative		themselves as with a disability and therefore will not declare it. However there are not considered to be any negative or adverse impacts on this protected characteristic as any intervention would be developed on a needs led basis. Any issues that are identified at referral stage would be factored into the services required by the offender
		*Expand box as required
Evidence: Information on this Characteristic will be available very soon. However it is subject to the offender disclosing on a voluntary basis.		
		*Expand box as required
Sources us	sed:	
		*Expand box as required

Sex/gender: Consider both men and women			
Please tick (🗸) the relevant box:		Overall impact: In Havering 85.1% of offenders are male and 14.9% of offenders are female.	
Positive	✓	Havering has the highest proportion of female offenders in London and also the 5 th highest proportion of opiate users in London.	
Neutral		Within probation services there is a recognition that the needs of female offenders may vary substantially to those of males. As a result the London Community Rehabilitation Company has made females an offending cohort of its own. There are a number of complex issues which female offenders have to deal with on a daily basis, often resulting in the sense of entrapment. Issues around: Sexual abuse Domestic Violence Attempted suicide Education training and employment Childcare Debt	
Negative			
		The London Borough of Havering in conjunction with Probation services has	

developed a Women's Empowerment Programme (WEP). The programme is designed to help female offenders feel that they can cope and that there are services out there to help them.

Topics such as relationships & domestic violence, self-esteem, sexual health, finance, cooking on a budget, drugs and alcohol are addressed in this. Specialist presenters from the NHS, Westminster Drugs Project, Citizens advice Bureau and more come along to provide advice and offer a self-referral route into their service.

Whilst we understand that there is a disproportionality of men perpetrating Domestic Violence, the interventions that would be put in place for this group will be developed under the Violence Against Women & Girls (VAWG) Strategy. Female offenders will have access to the Independent Domestic Violence Advisor (IDVA) service and they can also be referred into the local Woman's Aid service.

Males who are victims of domestic violence may be referred into the new male domestic violence service MENDAS.

A list of possible perpetrator interventions run by both the Community Rehabilitation Company (CRC) and National Probation Service (NPS) can be noted within Section 4 of the Reducing Reoffending Strategy 2016-2020. Some of which include:

- Building Better Relationships (BBR- programme for men who have been violent or abusive in their relationships),
- RESOLVE (Group for impulsive and instrumental aggression in men)
- Caring Dads (men who have physically or emotionally abused their children or their children's mother)

*Expand box as required

Evidence:

- •Over 50% of women in prison report having suffered Domestic Violence.
- Of all women sent to prison 37% attempted suicide.
- 1 in 3 women have reported to have experienced sexual abuse.
- •51 % of woman leaving prison are reconvicted within one year...

58% of those women identify unemployment and skills as a contributing factor.

- •It is estimated that 4 out of 10 female prisoners are mothers.
- •Most recent figures suggest 24% of woman in prison were serving time due to drug offences.
- •40% of woman left school before the age of 16.

*Expand box as required

Sources used:

Rehabilitation Company (CRC) and National Probation Service (NPS) direct

https://www.gov.uk/government/organisations/national-probation-service

http://www.londoncrc.org.uk/

http://www.womeninprison.org.uk/

http://mendas.com/index.php

*Expand box as required

Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (* the relevant b	,	Overall impact:
Positive	~	The over-representation of BME groups in the criminal justice system as a whole is well known and extensively documented in both quantitative and
Neutral		qualitative studies. In Havering the ethnic make-up of offenders tends to reflect the borough
Negative		 make-up, with 70% of White persons contributing to the highest volume of offences. Whilst this might seem high, it's in keeping with the borough profile. However in certain categories those offenders described as Black (including Mixed Race) are over-represented for a range of crimes, most notably personal robbery offences (however, it should be noted that this is a relatively low volume category of crime in Havering. For perpetrators of ethnicity/ racial crimes there are a number of programmes available through probation services. The two most notable are: Thinking Skills Programme (TSP)- this is where an offender would learn how to develop techniques to avoid committing this sort of crime in the future. Structured supervision sessions. – used to change or 'reframe' the thoughts, attitudes and beliefs
		*Expand box as required

Evidence:

• Those classified as White/IC1 account for the highest volume of offenders (accused) in Havering ranging from 52% of theft person offenders to 82% for hate crime. White offenders tended to contribute to over 70% of accused for most categories of crime, the notable exception being street crimes (personal robbery and theft person). For personal robbery there was a notable overrepresentation of those accused who were described as Black/IC3, accounting for 32% of offenders despite only making up 5.9% of Havering's population. For theft person, and in particular distraction thefts and pickpocketing, there was a notable overrepresentation of those accused who were described as IC2 (i.e. Romanian, Roma), accounting for 27% of offenders. It should be noted that street crime offences are low volume categories of crime.

*Expand box as required

Sources used:

Rehabilitation Company (CRC) and National Probation Service (NPS) direct https://www.gov.uk/government/organisations/national-probation-service https://www.londoncrc.org.uk/

http://www.irr.org.uk/research/statistics/criminal-justice/

Religion/faith: Consider people from different religions or beliefs including those with no				
religion or belief	religion or belief			
Please tick (✓) Overall impact:				
the relevant box:				

Positive		Due to recent restructures within the Probation Service and the Community Rehabilitation company not all information around Religion/ Faith has been		
Neutral	✓	easily accessible. Going forward we have been informed that this information should be accessible. It must be noted that this information is very subjective and only given on a voluntary basis.		
Negative		However there are not considered to be any negative or adverse impacts on this protected characteristic as any intervention would be developed on a needs led basis. Any identified issues or needs required by a person's faith or belief system that is identified through the assessment process, will be reflected in their bespoke probation supervision sessions.		
		*Expand box as required		
Evidence: Information of disclosing on		Characteristic will be available very soon. However it is subject to the offender untary basis.		
		*Expand box as required		
Sources us	ed:	Ехрапа вох аз гединеа		

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual			
Please tick (the relevant	,	Overall impact: Due to recent restructures within the Probation Service and the Community	
Positive		Rehabilitation company not all information around lesbian, gay and bisexual offenders has been easily accessible. Going forward we have been informed	
Neutral	~	that this information should be accessible. It must be noted that this information is very subjective and only given on a voluntary basis.	
Negative		However there are not considered to be any negative or adverse impacts on this protected characteristic as any intervention would be developed on a needs led basis. Any issues that are identified at referral stage would be factored into the services required by the offender	
		*Expand box as required	

Evidence: Information on this Characteristic will be available very soon. However it is subject to the offender disclosing on a voluntary basis.							
		*Expand box as required					
Sources us	ed:						
		*Expand box as required					
	_	ment: Consider people who are seeking, undergoing or have received					
	_	nent surgery, as well as people whose gender identity is different from					
their gender		Overall impact:					
the relevant l		Due to recent restructures within the Probation Service and the Community					
Positive		Rehabilitation company not all information around gender reassignment has been available. Going forward we have been informed that this information					
Neutral	✓	should be accessible. It must be noted that this information is very subjection and only given on a voluntary basis. However there are not considered to be any negative or adverse impacts on this protected characteristic as any					
		intervention would be developed on a needs led basis. Should any needs be					
		identified through the assessment process, these issues will be reflected in					
		their bespoke probation supervision sessions.					
Negative							
Negative							

Evidence:

Information on this Characteristic may be available very soon. However it is subject to the offender disclosing on a voluntary basis.

*Expand box as required

Sources used:			
	*Expand box as required		
Marriage/civil partnership: Consider people in a marriage or civil partnership			

		Expand box as required							
Marriage/ci	vil pa	artnership: Consider people in a marriage or civil partnership							
Please tick (the relevant k	,	Overall impact:							
Positive		n/a- Normally this applies to employment only (for pension rights and financial							
Neutral	~	arrangements)							
Negative		If this is in relation to domestic violence within a marriage /civil partnership. Steps can be taken to remove the partner through assistance from the Independent Domestic Violence Advisor, Havering Woman's Aid or Mendas. For more information please revert to the sex/ gender characteristics above. *Expand box as required							
Evidence:									
		*Expand box as required							
Sources us	ed:								
		*Expand box as required							

Pregnancy, maternity and paternity: Consider those who are pregnant and those who					
are underta	are undertaking maternity or paternity leave				
Please tick (✓)		Overall impact: Due to recent restructures within the Probation Service and the Community			
the relevant box:					
Positive	~	Rehabilitation company not all information around pregnancy, maternity and paternity has been available. Going forward we have been informed that this			
Neutral		information may be accessible. It must be noted that this information is very subjective and only given on a voluntary basis.			
Negative		In multi-agency risk panels this is something that is often dealt with on a case by case basis, partnerships and lead agencies will check that the offenders is linked in with the health visitor, that the individual is set up with a GP and depending on their/ their partners offending history or possible substance			

misuse social services would be notified. Where there is a concern a Merlin report is raised, This is a report which is entered onto the police computer system and it also triggers a safeguarding alert. (Please note that parental consent is not required for this under the Human Rights Act of 1998)

Domestic Violence needs to be taken into consideration when dealing with an offender under this characteristic. Approximately 33% of domestic violence incidents start to get worse when the female is pregnant. It should be noted that a female offender is almost twice as likely to be a victim of Domestic

There are a number of routes available to raise concern around domestic violence when an offender is pregnant or on maternity. This can be through their:

- GP
- Midwife
- Obstetrician
- Health visitor
- Social worker
- Probation officer
- Drugs and alcohol worker

Violence than a non-offender,

Other professionals.

As highlighted under the sex/ gender characteristic the individual can then be referred to the Independent Domestic Violence Advisor or to Havering Woman's Aid.

Further work is being done between Public Health England, the National Probation Service and the London Community Rehabilitation Company to make sure that all offenders are given equal opportunity to access primary health care (IE: GP's, Dentists etc.). Therefore any offender that is released as No Fixed Abode (NFA) will be able to use either the Probation Centre address or the drugs and alcohol services address as a care of address.

At present there are not considered to be any negative or adverse impacts on this protected characteristic as any intervention would be developed on a needs led basis. Should any needs be identified through the assessment process, these issues will be reflected in their bespoke probation supervision sessions.

Evidence:

- Nationally 30% of women experience domestic violence in some way shape or form
- Over 50% of women in prison report having suffered Domestic Violence.
- Over 1/3 of domestic violence incidents starts to get worse when a woman is pregnant.
- One midwife in five knows that at least one of her expectant mothers is a victim of domestic violence
- A further one in five midwives sees at least one woman a week who she suspects is a victim
 of domestic violence

*Expand box as required

Sources used:

http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/domestic-violence-and-pregnancy/

http://www.nhs.uk/conditions/pregnancy-and-baby/pages/domestic-abuse-pregnant.aspx

Socio-econ	omic	status: Consider those who are from low income or financially excluded				
background	S					
Please tick (✓)		Overall impact:				
the relevant l	box:					
Positive	Good health is a fundamental pre-requisite of effective resettlement since it is often required to access offender programmes and other services.					
Neutral		Health is a particularly important issue for the offender population for a number of reasons. Offenders can quite often suffer the same health				
Neutral		inequalities as other deprived sections of the community. Offenders may be likely to present with the negative effects of substance misuse, issues relating to mental health and the negative impacts that this can have on a person's ability to cease reoffending. The strategy aims to address poor health among all those in contact with the criminal justice system through referral to appropriate health services. Many of the interventions identified at resettlement stage related to health (specifically substance misuse) may not be dealt with under the Reducing Reoffending Strategy, but may be delivered through Drugs and Alcohol Strategy. Failure to comply with any of these interventions (Such as Drug Rehabilitation Requirements and Alcohol Treatment Requirements) may lead to could arrest and re-appearance at court. Finance 40% of offenders have highlighted finances as a contributing factor to their offending. A further 60% stated that their lifestyle was the main contributing factor toward their offending. 35% of drugs and alcohol users stated that substance misuse was the contributing factor towards their offending. All of the above require money to maintain. Often offenders will borrow money from friends, family, banks, loan sharks and also revert to crime in order to try and maintain their current position. As a result massive debts can occur, relationships can be broken, court costs and victim cost will occur. Financial				

entrapment can become all-encompassing with the feeling of no escape. The Reducing Reoffending Strategy recognizes this and highlights the use of the Citizens Advice Bureau and the Money Advice service as a route to exiting. Support around debts, arrears, credit unions and basic money saving advice is provided.

Finance and debt is addressed regularly with the female offender cohort through the Woman's Empowerment Programme (WEP).

Universal Credit

The introduction of Universal Credit could have significant financial implications both positive and negative. Universal Credit is designed to encourage people back into work. Those who would find themselves in employment but on a very low income (lower than on benefits) would find their wages topped up by universal credit. However sanctions imposed by the Department of Work and Pensions will be significant, with the worst case scenarios being penalized for up to 3 years. Offenders are mischievous by nature therefore it is not unreasonable to expect that a number of them will be affected by the sanctions. (Those who are sanctioned will be able to claim hardship, this is where an individual will have their income reduced by 40%-60% depending on their circumstances)

The other main fear with Universal Credit is that of the single payment. Offenders will be receiving their benefits and if applicable housing benefit all in one amount, as highlighted above lifestyle, debt and substance misuse may be distractions for individuals to spend their rent money on. As a result incurring big financial debts. Offenders who have been identified as in debt or at high risk of not paying their housing benefit to their landlords (drug users, alcoholics, gamblers etc) can be individually dealt with on a case by case basis by the Department of Work and Pensions (DWP) in order to find a suitable solution for all. In Havering Universal Credit is not expected to go live until February 2017 and will be fully operational by 2021. At present Havering only has approximately 800 individuals on Universal Credit.

*Expand box as required

Evidence:

- 39.8% offenders in Havering identified finance as a contributing factor to their offending
- 59.8% offenders in Havering identified lifestyle as a contributing factor to their offending
- 34.7% offenders in Havering identified drugs as a contributing factor to their offending
- 35.3% offenders in Havering identified alcohol as a contributing factor to their offending
- 23.8% offenders in Havering identified accommodation as a contributing factor to their offending

*Expand box as required

Sources used:

Havering adult offender profile https://www.gov.uk/universal-credit/overview

Action Plan

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
ALL			Whilst there are no identified adverse impacts across any protected characteristics it is considered that in order to effectively assess further impacts that diversity monitoring is undertaken on any of the initiatives undertaken as part of this strategy.	To be developed and in place in time for the review of the Strategy in 2020	Chris Stannett
Disability Religion/ faith Sexual orientation Gender reassignment Pregnancy, Maternity and Paternity	Due to recent restructures within the Probation Service and the Community Rehabilitation company not all information around protected	Community Rehabilitation Company and NPS now think that they can start sourcing the information. However it will be subjective as the majority of it is	Whilst there are no identified adverse impacts from the protected characteristics, information we might receive in the future may highlight trends we have not previously considered.	31 st October 2017	Chris Stannett

characteristics has been available.	down to voluntary disclosure.		

^{*} You should include details of any future consultations you will undertake to mitigate negative impacts

Review

The EIA is to be reviewed at the same time as the Reducing Reoffending Strategy.

The next review date: 04/10/2020

^{**} Monitoring: You should state how the negative impact will be monitored; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).