

# 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 **<u>5 working days</u>** 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 <u>diversity@havering.gov.uk</u>

### 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: Protected characteristic

Please tick (✓) relevant box:	the <b>Overall impact:</b> 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.	

**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.

#### 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

Please tick ( the relevant		Overall impact: Probation services have recognised that offenders needs will vary according 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 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:		
Positive	✓ t a			
Neutral	t			
Negative		<ul> <li>18-25 year old males – more specific focus on the transition from Youth to Adult and sourcing education and training opportunities for younger offenders</li> <li>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.</li> <li>Males 50+ - Focused work around entrenched re-offending</li> <li>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</li> <li>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.</li> </ul>		

	<ul> <li>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: <ul> <li>Accommodation</li> <li>Education training and employment</li> <li>Debt and financial issues</li> <li>Drugs and alcohol/</li> </ul> </li> <li>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.</li> </ul>
L	*Expand box as required

- 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 <a href="http://www.londoncrc.org.uk/">http://www.londoncrc.org.uk/</a>

Disability: Consider the full range	of disabilities;	including p	ohysical mental,	sensory and
progressive conditions				

progressive conditions			
Please tick (🗸)		Overall impact:	
the relevant k	box:	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	(*)	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 themselves as with a disability and therefore will not declare it	
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 <i>*Expand box as required</i>	

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 used:

Sex/gender: Consider both men and women				
Please tick (✓) the relevant box:		<b>Overall impact:</b> 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 <sup>th</sup> 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		
Negative		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 The London Borough of Havering in conjunction with Probation services has		

		<ul> <li>developed a Women's Empowerment Programme (WEP), designed to help female offenders feel that they can cope services out there to help them.</li> <li>Topics such as relationships &amp; domestic violence, self-ess finance, cooking on a budget, drugs and alcohol are addu Specialist presenters from the NHS, Westminster Drugs advice Bureau and more come along to provide advice at referral route into their service.</li> <li>Whilst we understand that there is a disproportionality of Domestic Violence, the interventions that would be put in will be developed under the Violence Against Women &amp; O Strategy. Female offenders will have access to the Indep Violence Advisor (IDVA) service and they can also be referent male domestic violence service MENDAS.</li> <li>A list of possible perpetrator interventions run by both the Rehabilitation Company (CRC) and National Probation S noted within Section 4 of the Reducing Reoffending Strate Some of which include:</li> <li>Building Better Relationships (BBR- programme for been violent or abusive in their relationships),</li> </ul>	e and that there are steem, sexual health, ressed in this. Project, Citizens nd offer a self- men perpetrating place for this group Girls (VAWG) endent Domestic erred into the local red into the new e Community ervice (NPS) can be regy 2016-2020.
		<ul> <li>RESOLVE (Group for impulsive and instrumental</li> <li>Caring Dads (men who have physically or emotion children or their children's mother)</li> </ul>	
			*Expand box as required
• Of all wome • 1 in 3 wome •51 % of wom 58% of those •It is estimate •Most recent	n sent en hav nan lea wome ed that figures	en in prison report having suffered Domestic Violence. t to prison 37% attempted suicide. e reported to have experienced sexual abuse. aving prison are reconvicted within one year en identify unemployment and skills as a contributing facto 4 out of 10 female prisoners are mothers. s suggest 24% of woman in prison were serving time due t t school before the age of 16.	
			*Expand box as required
Sources us	ed:		
Rehabilitatior	n Com	pany (CRC) and National Probation Service (NPS) direct	
http://www.lo	ndonc		
http://www.wo http://mendas		nprison.org.uk/ index.php	*Expand box as required
			•

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

the relevant box:         Positive       ✓       T         Neutral       ✓       In         Neutral       ✓       H         Neutral       ✓       F	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						
Positive     w       Neutral     q       Ir     m       O     H       M     p       Ic     F	whole is well known and extensively documented in both quantitative and qualitative studies. In Havering the ethnic make-up of offenders tends to reflect the borough nake-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						
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	<ul> <li>Structured supervision sessions. – used to change or 'reframe' the thoughts, attitudes and beliefs</li> </ul>						
Havering ranging tended to contrib exception being s was a notable of accounting for 32 theft person, and overrepresentation							
Sources used:	*Expand box as required						
Rehabilitation Compa https://www.gov.uk/go http://www.londoncrc.	any (CRC) and National Probation Service (NPS) direct overnment/organisations/national-probation-service .org.uk/ research/statistics/criminal-justice/						
	*Expand box as required						

**Religion/faith:** Consider people from different religions or beliefs including those with no religion or belief

 Please tick (
 Overall impact:

 the relevant box:
 Overall impact:

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.						

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 used:

Sexual orie	Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual							
Please tick ( $\checkmark$ ) the relevant box:		<b>Overall impact:</b> Due to recent restructures within the Probation Service and the Community						
Positive		Rehabilitation company not all information around lesbian, gay and bisexu offenders has been easily accessible. Going forward we have been inform						
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						

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 used:

\*Expand box as required

		ment: Consider people who are seeking, undergoing or have received					
gender reassignment surgery, as well as people whose gender identity is different from							
their gender	r at bi	rth					
Please tick () Overall impact:							
the relevant	box:	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 subjective 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					
Negative		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.					
		*Expand box as required					
Evidence:							

idence:

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

Sources	used:
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Marriage/ci	vil pa	artnership: Consider people in a marriage or civil partnership					
Please tick ( the relevant k		Overall impact:					
Positive		<i>n/a-</i> Normally this applies to employment only (for pension rights and financial					
Neutral	~	arrangements)					
		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					
Negative							
		*Expand box as required					
Evidence:							
		*Expand box as required					
Sources us	ed:						
		*Expand box as required					

Pregnancy,	Pregnancy, maternity and paternity: Consider those who are pregnant and those who					
are undertal	are undertaking maternity or paternity leave					
Please tick (	)	Overall impact:				
the relevant l	box:	Due to recent restructures within the Probation Service and the Community				
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 Violence than a non-offender,
<ul> <li>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:</li> <li>GP</li> <li>Midwife</li> </ul>
Obstetrician
Health visitor
Social worker
Probation officer
Drugs and alcohol worker
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.
*Expand box as required

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

Socio-econ	Socio-economic status: Consider those who are from low income or financially excluded				
backgrounds	s				
Please tick (v		Overall impact:			
the relevant k	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			
Negative		<ul> <li>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.</li> <li>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.</li> <li>Finance</li> <li>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</li> </ul>			

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		
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	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 <sup>st</sup> 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

\*\* 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).

#### Review

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

The next review date: 04/10/2020