

## **Equality Impact Assessment (EIA) Engagement and our equality duty**

Whilst [the Gunning Principles](#) set out the rules for consulting 'everyone', additional requirements are in place to avoid discrimination and inequality.

Cheshire East Council is required to comply with the Equality Act 2010 and the Public Sector Equality Duty. The Equality Act 2010 simplified previous anti-discrimination laws with a single piece of legislation. Within the Act, the Public Sector Equality Duty (Section 149) has three aims. It requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act, by consciously thinking about equality when making decisions (such as in developing policy, delivering services and commissioning from others)
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, by removing disadvantages, meeting their specific needs, and encouraging their participation in public life
- foster good relations between people who share a protected characteristic and people who do not

The Equality Duty helps public bodies to deliver their overall objectives for public services, and as such should be approached as a positive opportunity to support good decision-making.

It encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people's opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve providing a service in a way which is appropriate for people who share a protected characteristic, such as providing computer training to all people to help them access information and services.

The Equality Act identifies nine 'protected characteristics' and makes it a legal requirement to make sure that people with these characteristics are protected from discrimination:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

### **Applying the equality duty to engagement**

If you are developing a new policy, strategy or programme you may need to carry out an Equality Impact Assessment. You may be able to ascertain the impact of your proposal on different characteristics through desk-based research and learning from similar programmes, but you also need to carry out some primary research and engagement. People with protected characteristics are often described as ‘hard to reach’ but you will find everyone can be reached – you just need to tailor your approach, so it is accessible for them.

Contacting the [Equality and Diversity mailbox](#) will help you to understand how you can gain insight as to the impacts of your proposals and will ensure that you help the Council to comply with the Equality Act 2010 and the Public Sector Equality Duty.

**Section 1 – Details of the service, service change, decommissioning of the service, strategy, function or procedure**

<b>Proposal Title</b>	CCTV Service Review
<b>Date of Assessment</b>	17 December 2024
<b>Assessment Lead Officer Name</b>	Tracey Bettaney
<b>Directorate/Service</b>	Place/Regulatory Services
<b>Details of the service, service change, decommissioning of the service, strategy, function or procedure.</b>	<p>As part of the development of options for the Council’s MTFS 2025-2026 it was agreed that there exists an opportunity to undertake a review of the CCTV service to determine the approach to future provision. The review will focus on options for change to the current operating model, including decommissioning, and potential income generation opportunities, with the aim to reduce the budgetary commitment to the service.</p> <p>Although the CCTV service is considered a discretionary function it supports the duty of section 17 of the Crime and Disorder Act 1998 and the obligation on Local Authorities to work in partnership, to develop and implement a strategy for tackling crime and disorder. Section 163 of the Criminal Justice and Public Order Act 1994 creates the power for local authorities to provide closed circuit television coverage of any land within their area for the purposes of crime prevention or victim welfare.</p> <p>The Cheshire East CCTV Service currently operates on a 24/7/365 basis with two daily shifts of 12 hours. Two operators cover each shift. There are two supervisors (also trained CCTV operators) to support the Team (also trained CCTV operators) and a CCTV Manager. The service also holds third party accreditation to the Home Office Surveillance Camera Code of Practice and the British Standard BS7958 for control room management.</p> <p>During the 17 month period between April 2023 and October 2024 the CCTV service dealt with over 20,000 incidents, 50% of which were as a result of direct observation by a CCTV operator. Other significant referral routes were the police airwave radio as well as direct police contact, direct telephone calls to the service and the pub and shop watch system – Radiolink.</p>

**Initial Options**

1. Do nothing – Retain the service with no changes

This option would maintain CCTV service delivery as it currently exists; Two twelve-hour shifts with two operators per shift on a 24/7/365 footprint.

2. Do Something 1: Retain the service with minor restructure

With this model it has been identified that there is scope to restructure the team at supervisory level and maintain the current two twelve-hour shifts with two operators per shift on a 24/7/365 footprint. This would have no impact on current service delivery levels and retain the potential to grow income generating services going forward.

3. Do Something 2: Full directed observations with reduced staff support

The development of a 'linked shift' rota would seek to reduce the number of operators on shift during the 24-hour period on weekdays (36 paid hours per day reduced from 48 hours). Weekends, where demand and risks of harm are greater, would continue with 2 operators per shift. This would result in a small reduction to current service delivery levels, retaining current income with potential to grow further going forward.

4. Do Something 3: A mix of direct observation and recorded surveillance with reduced staffing support

The peak demand shift would operate over a working week with two 11-hour shifts between 7am and 11pm creating a six-hour cross over period between 12pm and 6pm. There would be no operator cover between 11 pm and 7 am each day instead there would be camera recording only. This would have a significant impact on service delivery and knock on impacts to current income as well as reducing future income due to a diminished 'live' service.

	<p>5. Do Something 4: Cease All CCTV operations.</p>
<p><b>Who is Affected?</b></p>	<p><b>Local Residents – including those who share one or more protected characteristics</b>  Cheshire East residents are used to the presence of CCTV in their towns and villages. A survey in 2021 indicated that 94.7% of respondents would like to see the level of CCTV either stay the same or increase with 70% asking for increased CCTV coverage. The same survey also reported that 94.9% of respondents supported the use of CCTV and that CCTV makes both residents and visitors feel safer.</p> <p>The current operating model provides for 24/7/365 fully observed monitoring by CCTV operators – with the knowledge that fully monitored systems not only detect crime but act as a deterrent to criminal activity.</p> <p>The removal of any CCTV monitoring be that the decommissioning of the service or a reduction in observed monitoring hours will potentially lead to an increase in crime and/or the perception of crime.</p> <p>There is the potential for specific impact to our rural communities which are often targeted by opportunistic criminals i.e. fly tippers and therefore rely on the use of deployable cameras to help detect and deter individuals. A reduction in service capacity would have therefore have a negative impact.</p> <p><b>CCTV Staff</b>  The initial options identified for consultation include, as a minimum, the introduction of periods of lone working with a reduction in staff numbers and as a worst case scenario the deletion of posts within the service. This will result in financial hardship to staff members affected by the changes.</p> <p><b>Elected Members, Town &amp; Parish Councillors</b>  Town and Parish Councils currently buy into a fully monitored CCTV service for their respective communities helping to promote public safety, support communities and community events and act as a deterrent for antisocial and criminal behaviour. Any changes to the operating model will impact upon this aspiration and their commitment to buy into the service which will ultimately impact income generation.</p>

	<p><b>Cheshire East Council Services</b>  The CCTV Service currently provides out of hours support for other services within the Council. This can be as a call handling and advice line, cover for close down periods i.e. Christmas and Bank Holiday, lone working monitoring and a control hub in the case of emergency situations. The loss of the service or a reduction in capacity will impact those services will require alternative in-service arrangements to be made which may incur additional costs e.g. Increased salary costs.</p> <p><b>Enforcement Agencies</b>  A review of service users has identified that the Police are the most prevalent partner. 87% of all evidence packages to support formal action are requested by the police. The CCTV control room is often requested to undertake direct live surveillance of ongoing situations and additionally the Police Airwave radio that is permitted for use in the Control Room can alert operators to ongoing incidents facilitating almost instantaneous monitoring.</p> <p>The loss of live surveillance will have a direct impact upon the ability of the police to identify ongoing criminal activity where they might normally have the opportunity to apprehend the criminal whilst the offence is ongoing.</p> <p><b>Business Customers</b>  The service provides CCTV support to local businesses (pubs and shops) through the Radiolink system. In the absence of an operator to capture images of a suspect individual reported over the radio and communicate their whereabouts to businesses and the police means that criminal activity will not be swiftly addressed.</p>
<p><b>Links and impact on other services, strategies, functions or procedures.</b></p>	<p>As detailed above the CCTV provides support for other service areas of the Council. Peak times for out of hours call is between 07.00 and 08.30 prior to the customer contact centre opening and after the contact centre closes at 17.00. The CCTV service has specific protocols for handling service calls out of hours either providing an immediate response, signposting to further advice or in some cases alerting designated officers if immediate action is required.</p>

	<p>Changes to the operating model for the service, including periods of lone working and periods where there is no available staff member will clearly impact upon capacity and the ability to provide support.</p> <p>Other Council service areas may therefore have to review their current out of hours contact requirements and fund in-service arrangements to meet their own individual needs, particularly where statutory requirements exist.</p> <p>At the current time 'Martyn's Law' is passing through Parliament. This proposed legislation will require specific actions in relation to 'relevant premises' to ensure that the protection of individuals from the threats of terrorism is fully considered and implemented. Cheshire East will have specific responsibilities in relation to its own premises and although CCTV is not a mandated measure, any opportunities for its effective use will be impacted by reduced capacity within the CCTV service.</p>
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<p><b>How does the service, service change, strategy, function or procedure help the Council meet the requirements of the <a href="#">Public Sector Equality Duty</a>?</b></p>	<p>The Public Sector Equality Duty is a legal requirement contained within the Equality Act 2010 which requires public authorities and others carrying out public functions to have due regard to the need to:-</p> <ul style="list-style-type: none"> <li>• Eliminate unlawful discrimination, harassment and victimisation</li> <li>• Advance equality of opportunity between people who share a protected characteristic and those who do not</li> <li>• Foster good relations between people who share a protected characteristic and those who do not to assist those facing discrimination, harassment, and discrimination.</li> </ul> <p>The CCTV Service has the potential to provide significant evidence in response to complaints of discrimination, harassment and victimisation which takes place in the public domain. In some instances, CCTV operators may witness incidents that fall under this category and be able to alert the police so that they can take direct action.</p> <p>This ability will be reduced in line with any reduction in service delivery.</p>
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## Section 2- Information – What do you know?

<b>What do you know?</b>	<b>What information (qualitative and quantitative) and/or research have you used to commission/change/decommission the service, strategy, function, or procedure?</b>
<p><b>Information you used</b></p>	<p>The CCTV service is able to produce very detailed reports on the activity it carries out. To support the review process information for the period April 2023 to October 2024 has been scrutinised. This has provided the following information.</p> <ul style="list-style-type: none"> <li>• The total number of incidents that have been dealt with.</li> <li>• The source of report i.e. direct operator observations, notifications from the police, general public, fire service etc.</li> <li>• The types of incidents reported e.g. violent crime, theft, antisocial behaviour etc.</li> <li>• Peak times when incidents take place – days of the week, hours of the day.</li> <li>• Geographical location of the incident.</li> <li>• The increase in demand for camera installation and monitoring.</li> </ul>



	<p>In addition, there has been a review of financial information to provide details on efficiency changes made by the service over the past five years, income generation and the net effect to the CCTV budget.</p> <p>The service has considered the results of the Cheshire East CCTV Opinion Survey 2021/Safety of Women in Public Places Survey 2021 to understand current attitudes to the provision of CCTV within the Borough which concluded that 94.9% of respondents are in support of the use CCTV and that CCTV makes both residents and visitors feel safer; 94.7% would like to see the level of CCTV either stay the same or increase with 70% asking for increased CCTV Coverage.</p> <p>There has been initial contact with neighbouring authorities to determine their current approach to their provision of CCTV which has identified that all have inhouse provision. This has been supplemented by a more national enquiry of the same request through the APSE network which identified internal provision and no significant external funding.</p> <p>Through the national CCTV User Group information has been sought on funding arrangements with the PCC and any charging structure in place for services requested by the Police.</p>
<p><b>Gaps in your Information</b></p>	<p>To date there has been a commitment to a review of the CCTV service through an objective in the MTFs 2025-2026. This has created options for changes to service delivery to help highlight the financial challenges facing the Council and the need to ensure that delivered services are cost effective and proportionate. The options are not exclusive but are seeking to stimulate discussion.</p> <p>Further consultation is now required to fully understand the implications of the proposed options and /or identify any further service delivery options. Consultation will also support the assessment of impact of the options upon those who share one or more protected characteristics and will support the democratic decision-making process.</p>

### 3. What did people tell you?

What did people tell you	What consultation and engagement activities have you already undertaken and what did people tell you? Is there any feedback from other local and/or external regional/national consultations that could be included in your assessment?
<p><b>Details and dates of the consultation/s and/or engagement activities</b></p>	<p>There has been no direct consultation with service users and the Cheshire East community. However, in pulling together information for the review the following information has been provided and considered.</p> <p>The service has revisited the results of the Cheshire East CCTV Opinion Survey 2021/Safety of Women in Public Places Survey 2021 to understand current attitudes to the provision of CCTV within the Borough which concluded that 94.9% of respondents are in support of the use CCTV and that CCTV makes both residents and visitors feel safer; 94.7% would like to see the level of CCTV either stay the same or increase with 70% asking for increased CCTV Coverage.</p> <p>There has been initial contact with neighbouring authorities to determine their current approach to their provision of CCTV which has identified that all have inhouse provision. This has been supplemented by a more national enquiry of the same request through the APSE network which identified internal provision and no significant external funding.</p> <p>Through the national CCTV User Group information has been sought on funding arrangements with the PCC and any charging structure in place for services requested by the Police.</p> <p>All efforts will be made to engage with groups and stakeholders which represent parties who share one or more protected characteristic during the consultation period. Mitigations will be considered where possible and monitoring of impact of any changes will be undertaken.</p>

<b>Gaps in consultation and engagement feedback</b>	<p>It will be necessary to ensure that consultation on the proposed service review includes both internal and external stakeholders in order to help better quantify (objectively and subjectively) the impacts of any changes to the current CCTV provision and to identify whether any further service delivery models need to be considered as part of ongoing work.</p> <p>Consultation will be designed in the coming weeks with a view to publication in late January/early February 2025.</p>
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#### 4. Review of information, consultation feedback and equality analysis

<b>Protected characteristics groups from the <a href="#">Equality Act 2010</a></b>	<b>What do you know?</b> Summary of information used to inform the proposal	<b>What did people tell you?</b> Summary of customer and/or staff feedback	<b>What does this mean?</b> Impacts identified from the information and feedback (actual and potential). These can be either positive, negative or have no impact.
<b>Age</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p> <p>Younger people are less risk averse and lower perception of fear of crime but are more likely to be victims or perpetrators.</p> <p>CCTV has a positive impact on fear of crime in communities. Reducing the budget will inevitably lead to reduced CCTV camera. This could lead to increased fear of crime and less opportunity to tackle crime.</p>	<p>Potential impacts on feeling safe in public spaces can impact all age groups.</p> <p>Analysis response to CCTV consultation can support intelligence about the impact of change.</p>	<p>It is proposed to review of any relevant data and feedback on the impact of the proposals upon this group.</p>
<b>Disability</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p>	<p>Potential impact on ability to effectively investigate hate crime incidents linked to visible disabilities</p>	<p>Review of relevant crime and incident data.</p>

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<b>Gender reassignment</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p> <p>Reducing the budget will inevitably lead to reduced CCTV cameras. This could lead to increased fear of crime and less opportunity to tackle crime.</p>	Potential impact on ability to effectively investigate crime incidents.	It is proposed to review of any relevant data and feedback on the impact of the proposals upon this group.
<b>Pregnancy and maternity</b>	Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.	At this time, it is assessed that the impact of change will be low.	
<b>Race/ethnicity</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p> <p>Reducing the budget will inevitably lead to reduced CCTV cameras. This could lead to increased fear of crime and less opportunity to tackle crime.</p>	Potential impact on ability to effectively investigate hate crime incidents.	Review of relevant crime and incident data.

<b>Religion or belief</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p> <p>Reducing the budget will inevitably lead to reduced CCTV cameras. This could lead to increased fear of crime and less opportunity to tackle crime.</p>	Potential impact on ability to effectively investigate hate crime incidents.	Review of relevant crime and incident data.
<b>Sex</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p>	Potential impact on feelings of safety in public spaces may have an impact upon women more. Office of National Statistics Data indicates one in two women felt unsafe walking alone after dark compared with one in seven men.	Review of relevant crime and incident data.
<b>Sexual orientation</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p> <p>Reducing the budget will inevitably lead to reduced CCTV cameras. This could lead to increased fear of crime and less opportunity to tackle crime.</p>	Potential impact on ability to effectively investigate hate crime incidents.	Review of relevant crime and incident data.
<b>Marriage and civil partnership</b>	<p>Limited data on the potential impact of change. However, the consultation will enable feedback to be made, and an assessment of any impacts identified.</p>	At this time, it is assessed that the impact of change will be low.	It is proposed to review of any relevant data and feedback on the impact of the proposals upon this group.

## 5. Justification, Mitigation and Actions

Mitigation	What can you do? Actions to mitigate any negative impacts or further enhance positive impacts
<p>Please provide justification for the proposal if negative impacts have been identified?</p> <p>Are there any actions that could be undertaken to mitigate, reduce or remove negative impacts?</p> <p>Have all available options been explored? Please include details of alternative options and why they couldn't be considered?</p> <p>Please include details of how positive impacts could be further enhanced, if possible?</p>	<p>This proposal will be subject to public consultation and therefore the consultation may identify specific impacts that need to be considered and addressed.</p> <p>Other crime prevention measures can be utilised in areas affected by specific crime types (e.g. improving lighting or removing obstructions which impact on visibility of the area). These types of measures are an on-going consideration of partners in multi-agency community safety meetings.</p>


## 6. Monitoring and Review -

<b>Monitoring and review</b>	<b>How will the impact of the service, service change, decommissioning of the service, strategy, function or procedure be monitored? How will actions to mitigate negative impacts be monitored? Date for review of the EIA</b>
<b>Details of monitoring activities</b>	Review of relevant crime and incident data will be undertaken annually to determine any impact once a preferred option has been identified and implemented.
<b>Date and responsible officer for the review of the EIA</b>	Head of Service – Regulatory Services – one year from implementation.

## 7. Sign Off

When you have completed your EIA, it should be sent to the [Equality, Diversity and Inclusion Mailbox](#) for review. If your EIA is approved, it must then be signed off by a senior manager within your Department (Head of Service or above).

Once the EIA has been signed off, please forward a copy to the Equality, Diversity and Inclusion Officer to be published on the website. For Transparency, we are committed to publishing all Equality Impact Assessments relating to public engagement.

<b>Name</b>	<b>Tracey Bettaney</b>
<b>Signature</b>	
<b>Date</b>	21 January 2025

## 8. Help and Support

For support and advice please contact [EqualityandInclusion@cheshireeast.gov.uk](mailto:EqualityandInclusion@cheshireeast.gov.uk)