

Equality Impact Assessment



Assessment Of: Executive Report, July 2025, on the proposals relating to the management of unauthorised encampments.	
☒ Policy ☐ Strategy ☐ Function ☒ Service ☐ Other:	☒ New ☐ Already exists / review ☐ Changing
Directorate: Customer	Assessment carried out by: Chris Braines
Service Area: Environmental Services	Job Role: Head of Environmental Services
Version / Date of Sign Off by Director:	22/07/2025

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Unauthorised encampments create significant demands on our resources through the eviction process, requirements to clean the site and surrounding areas, repair any damage caused and deal with complaints from residents and businesses that have been impacted. The proposals ensure that equality considerations are taken into account at each stage of the process and human rights are protected.

The proposals relate to

- specific 'target hardening' measures at specified sites to restrict unauthorised access.
- Propose re-engagement with other Councils and partner agencies to explore potential solutions for a network of transit sites.
- Support a revised future approach to managing Unauthorised Encampments to make the reactive process to unauthorised encampments more efficient.

1.2 Who will the proposal have the potential to affect?

☐ Service users	☒ The wider community	☒ Teignbridge workforce
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1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

☒ **Yes** ☐ **No** [please select]

There are possible impacts on health and quality of life for individuals who are part of an unauthorised encampment or who are affected by them.

Under the Race Relations Act 1976, the courts decided that Romany Gypsies and Irish Travellers are racial (ethnic) groups, entitled to the full protection of the anti-discrimination legislation, whether or not they travel. This protection continues under the Equality Act 2010. Under the Equality Act 2010, a Public-Sector Equality Duty places a duty on the Council to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons of different groups. Also, it is unlawful to treat someone less favourably because of the protected characteristic of race. The proposals aim to ensure that good relations are fostered with those who are staying in the unauthorised encampment.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation for age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Please see: [Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk).

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
The average estimated cost per encampment is £2,638	There is an ongoing cost implication to manage UE's
There were 23 formal complaints between 2019 and 2024.	There is a significant impact to our communities relating to UE's
Devon Census 2021 Data Census 2021 - Facts and Figures	Population statistics
LG Inform Teignbridge Profile Home LG Inform	Basic district statistics including

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
	population and demographics
Legal Powers Dealing with illegal and unauthorised encampments Guidance on Managing Unauthorised Camping (2004)	Government Guidance for dealing with illegal and unauthorised encampments – a summary of available powers
https://www.devon.gov.uk/educationandfamilies/document/handbook-for-managing-unauthorised-encampments#site-visits-gender-and-cultural-considerations	Tells us about different types of prejudice towards Gypsies and Travellers
Traveller caravan count - GOV.UK	Statistical count of the number of caravans on both authorised and unauthorised sites across England. The count takes place every January and July.
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

☐ Age	☐ Disability	☐ Gender Reassignment
☐ Marriage and Civil Partnership	☐ Pregnancy/Maternity	☐ Race
☐ Religion or Belief	☐ Sex	☐ Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

No significant gaps.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure, please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Site specific measures have factored in regular authorised users such as schools, community groups and local businesses when considering suitable designs. Liaison with the local police and the Gypsy and Travellers forum is ongoing.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

Where works are planned at specific sites engagement and communication with regular authorised users will be included as part of the works programme.

The work relating to strategic sites will include engagement with a wide range of stakeholders including other local authorities and the Gypsy and Travellers forum. Many people directly impacted are not accessible in our area due to their nomadic nature.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS <i>(highlight any potential issues that might impact all or many groups)</i>	
Unauthorised encampments have the potential to generate distress to settled communities and those forming the unauthorised encampments. The proposals recognise that tensions can occur as a result of this. If the situation is not managed well there is potential for this tension to escalate. The proposals attempt to strike the balance between meeting the reasonable needs of all groups	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒

Potential impacts:	Welfare requirements and access to services. Exposure to anti-social behaviour.
Mitigations:	The approach clarifies the undertaking of welfare checks and requires decisions on action to be taken to take account of the findings of the welfare survey. The age of any Gypsies and Travellers will be a factor in this assessment.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒ Neutral ☐
Potential impacts:	Welfare requirements and access to services. Exposure to anti-social behaviour.
Mitigations:	The approach clarifies the undertaking of welfare checks and requires decisions on action to be taken to take account of the findings of the welfare survey. The age of any Gypsies and Travellers will be a factor in this assessment and in dealing with complaints associated with UE's.
Disability	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒ Neutral ☐
Potential impacts:	Disabled Gypsies and Travellers may require access to services and the welfare assessment will help to identify these needs
Mitigations:	The welfare assessment will identify any disability needs and information and advice will be given. The needs identified will be shared with the relevant agencies. Access, for example, to health services, can be provided as a consequence of conducting the welfare assessment
Sex	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐ Neutral ☐
Potential impacts:	Welfare requirements and access to services. Exposure to anti-social behaviour. According to the Equality and Human Rights Commission, Gypsy and Traveller mothers are 20 times more likely than others to experience the death of a child and/or miscarriage.
Mitigations:	Undertaking welfare checks and sharing welfare information and links to services
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐ Neutral ☐
Potential impacts:	Gypsy and Travellers are recognised as an ethnic group. The approach proposed recognises their cultural heritage and strikes to find a balance between their right to a nomadic lifestyle and the impact that an unauthorised encampment can have on the local community. Unauthorised encampments have the potential to generate distress to settled communities and the policy recognises that tensions can occur as a result of this. If the situation is not managed well there is potential for this tension to escalate. The proposals attempt to strike the balance between meeting the reasonable needs of all groups and recognised races.
Mitigations:	Ensuring the Policy and procedures are adhered to and links are made with the Communications team and partner agencies to ensure any issues relating to discrimination or hate are dealt with
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒

Potential impacts:	
Mitigations:	

OTHER RELEVANT CHARACTERISTICS

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes ☐ No ☐ Neutral ☒
Potential impacts:	
Mitigations:	
Other group(s) Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The proposals take a proportionate approach that complies with our Public Sector Equality Duty, including being clear to the settled communities that we will respond if issues are reported, but we should be resilient with challenging reporting based on prejudice and hate.

Everyone has a right to respect for their private and family life which means a right to a live how they choose which must be respected, which includes the right to live a nomadic or settled life, provided it does not interfere with other rights or laws.

There is nothing unlawful in following a nomadic lifestyle, although there is no legal right to stop on someone else's land without consent.

Under the Race Relations Act 1976, the courts decided that Romany Gypsies and Irish Travellers are racial (ethnic) groups, entitled to the full protection of the anti-discrimination legislation, whether or not they travel. This protection continues under the Equality Act 2010.

People are protected from discrimination where they are perceived to be, or are associated with, someone who is Romany Gypsy or Irish Traveller or any other protected characteristic.

New Age Travellers are not currently defined as a racial or ethnic group but are included in the Housing Act definition.

Under the Equality Act 2010, a Public-Sector Equality Duty places a duty on the Council to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons of different groups. Also, it is unlawful to treat someone less favourably because of the protected characteristic of race.

The proposals are designed to ensure where possible good relations are fostered. It also aims to eliminate unlawful discrimination against those staying in the UE. Each UE will be dealt with according to the needs and behaviour of those individuals and according with the Policy adopted by the Council.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Community tensions are a concern. The proposals will ensure information is shared with partner agencies at the earliest possible opportunity to minimise the concerns.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Engagement with the G&T Forum Ensuring effecting communication with stakeholders regarding UEs overseen by Communications to ensure it fosters good relations. Proactive communications to ensure the community are kept updated will be incorporated into the process.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Gypsy & Traveller Liaison Group Update	Jon Lloyd Owen	August 2025
Community Engagement with site users prior to works	Mark Payne	August 2025
Site Works	Chris Braines	August 2025

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

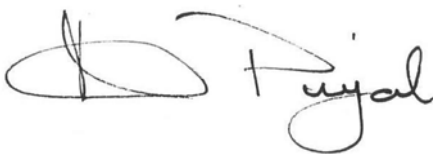
Monitoring of complaints and engagement with key stakeholders.
Number of UE's at sites where target hardening measures are delivered.
Progress on strategic transit sites.

4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?

Yes. By furthering the awareness of the protected characteristics and challenges UE's create between settled and nomadic people and through delivery of a proactive communications strategy.

Step 5: Review & Sign-Off

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

Reviewed by Service Manager: Yes ☒ No ☐ Instead was reviewed by: Chris Braines	Strategic Leadership Team Sign-Off: 
Date: 22/07/2025	Date: 22/07/2025