

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

<b>Directorate:</b> Communities, Housing and Environment	<b>Service area:</b> Safer Stronger Communities (Safer Leeds)
<b>Lead person:</b> Paul Money	<b>Contact number:</b>
<b>Date of the equality, diversity, cohesion and integration impact assessment:</b> 8 <sup>th</sup> June 2021	

<b>1. Title: Future developments with regards to addressing and reducing on-street sex work in the city</b>
Is this a:
<input checked="" type="checkbox"/> <b>Strategy / Policy</b> <input type="checkbox"/> <b>Service / Function</b> <input type="checkbox"/> <b>Other</b>
<b>If other, please specify</b>

**2. Members of the assessment team:**

<b>Name</b>	<b>Organisation</b>	<b>Role on assessment team For example, service user, manager of service, specialist</b>
Paul Money	Safer Stronger Communities (Safer Leeds)	Chief Officer of Safer Stronger Communities (Safer Leeds)
Jane Maxwell	Safer Stronger Communities (Safer Leeds)	Head of Service
Nicola Stewart	Safer Stronger Communities (Safer Leeds)	Programme Manager

### 3. Summary of strategy, policy, service or function that was assessed:

This EIA assesses the impact of the development and implementation of a proposed revised approach to tackling on-street sex working in the city.

The new approach proposed would replace the existing 'Managed Approach' (MA), which has been the evolving model for managing on-street sex work in Leeds since 2014, and aims to:

- reduce the problems caused by on-street prostitution to residents and businesses which currently suffer such nuisance;
- better engage with on-street sex workers to improve their safety, health and wellbeing with a view to reducing their need to be actively involved in sex work, and;
- reduce the prevalence of on-street sex work in the city.

The proposals for a revised approach follow an evaluation of the current evidence which finds that the number of sex workers currently operating is now substantially lower than before the MA was introduced, and has further decreased when compared to the period immediately before the Covid-19 restrictions were imposed in the UK. The impact of Covid-19 coupled with progress in the delivery of wide-ranging support to sex workers and the work done to reduce the adverse consequences of on-street sex work taking place in a particular community have all contributed to this reduction.

The new approach will continue to focus on reducing harm associated with on-street sex work and on delivering the three key aims of our overarching strategy. However, the following changes to operational delivery are proposed:

- The MA's previously defined hours of operation (8pm to 6am) whereby women could solicit for sex in a small light industrial area of Holbeck, without being subject to police engagement and enforcement action in specific circumstances, have not been active since March 2020 in line with Covid-19 legislation and government guidance. It is proposed that these defined operational hours will not be re-introduced into the partnership working arrangements. As such, no soliciting offences will be allowed to take place at any time in the area previously covered by the MA.
- Appropriate powers will be proportionately used to seek to prevent soliciting taking place in any area of the city where it may be occurring, with a renewed focus on seeking to use all legal powers available to partners against those seeking to pay for sex.
- In addition, work is currently being undertaken to assess the feasibility of introducing a Public Space Protection Order (PSPO) in selected residential areas located near to where sex work has been identified as taking place. If granted, this will provide additional powers to tackle issues such as anti-social behaviour and on-street drinking and will include the issuing of on-the-spot fines against anyone found to be involved in this type of activity. This will be managed in a way that will ensure that any offences committed are proportionately progressed recognising the potential vulnerability of people living in challenging circumstances.

We recognise that some degree of sex work is still likely to be seen in Holbeck as there remains a number who, for many different and often complex reasons, wish to continue operating. We're acutely aware of the vulnerability of the women involved in on-street sex

work and the need to continue to safeguard them and mitigate the risks associated with this type of activity. It is for this reason that other important elements of our work will continue including:

- The dedicated police patrols,
- The extensive use of monitored public CCTV,
- Late night Safer Leeds high visibility mobile and foot patrols
- Outreach activity and the full range of support all services assisting the women currently provide
- Dynamic and dedicated street cleansing capability

**4. Scope of the equality, diversity, cohesion and integration impact assessment**  
(complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

**4a. Strategy, policy or plan**

(please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input checked="" type="checkbox"/>

**Please provide detail:**

The three overarching aims of the strategy remain the same, and a number of key components of the existing delivering model will continue to exist. This assessment therefore relates only to the changes in operational delivery which are described above.

**4b. Service, function, event**

please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input type="checkbox"/>
Procuring of a service (by contract or grant)	<input type="checkbox"/>

**Please provide detail:** N/A

## **5. Fact finding – what do we already know**

Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.

(priority should be given to equality, diversity, cohesion and integration related information)

### **Sex working cohort**

The on-street sex working cohort in Leeds is intensively case managed through close partnership working with LCC, WYP and third sector agencies and this provides an understanding of the equality characteristics of this group.

It is known that all individuals known to be selling sex on-street in the Holbeck area of Leeds are women\*. Prior to Covid-19, a significant minority of those women were Eastern European, with the majority British and predominantly White.

Since March 2020, there have been significantly fewer women selling sex on street in Holbeck. There is also no longer evidence of a significant Eastern European minority and data suggests the women actively working are British, predominantly White and live in Leeds.

\*This includes trans women, although based on the equality data available, trans women have only been identified on a very small number of occasions.

Factors driving entrance into on-street work include: poverty, debt, homelessness (including insecure and unsafe accommodation), drug and alcohol addiction, long-term physical and mental health conditions, domestic abuse, coercion and barriers to alternative employment e.g. criminal record, low qualification levels and lack of suitable work. For many women working on street, a number of these factors will be present.

### **Previous consultation with on-street sex workers**

Consultation with sex workers has been largely led by the specialist sex worker services who are engaged through the MA governance arrangements and have existing, trusting relationships with the women they support. Services have sought the views of sex workers in relation to the MA and the provision that is (or needs to be) available to them, and fed this back through various appropriate forums. Additionally, the commissioned specialist sex worker service have developed their offer in co-production with women who have experience of on street sex worker to ensure it meets their needs.

### **Local Holbeck community**

Holbeck is an MSOA in the inner south of Leeds with an estimated population of 8815 (ONS, 2019). Based on the 2011 Census, 61.1% of Holbeck residents are White British and 38.9% Minority Ethnic. When compared with Leeds and England, Holbeck has a relatively young population and a high proportion of transient renters. Holbeck is home to one of Leeds City Council's twelve priority neighbourhoods (LSOAs) which have been identified as being in the most deprived 1% of neighbourhoods nationally. The total crime rate per 1000 population is higher than that for Leeds and England for most crime types. The Listening Well report published in January 2021 by the Voice of Holbeck describes the Holbeck community as *"a local community [which] continues to face many challenges but also houses people of exceptional resilience."*

**Previous consultation with the Holbeck community**

Consultation around the response to on-street sex work in Holbeck has been ongoing with members of the local community for a number of years, with records of specific groups meeting to discuss the issue with Councillors, Council Officers and West Yorkshire Police dating back to 2009.

In 2016, following the implementation of the MA, QA research were commissioned by Leeds City Council to consult with local residents about businesses about the MA. 308 Holbeck residents and 49 businesses contributed.

*When asked ‘What decision would you like the council and police to take about the “managed approach” locally?’ the responses were as follows:*

	Continue with the MA as it is	Continue with the MA but with rule changes	Stop the MA
Residents	38%	32%	30%
Businesses	24%	41%	35%

Following this, rule changes were made for example, the operational hours were shortened from 7pm – 7am to 8pm – 6am and additional investment was made into street cleansing services.

From 2017 onwards, the MA strategic leads met regularly with local resident groups to hear their views, and community members were invited to have a regularly position at the MA operational group.

**Are there any gaps in equality and diversity information?****Please provide detail:**

Sex worker cohort information is largely based on sex worker engagement with the dedicated policing team and support services. The quality of this data has improved over time and is now considered by all partners to be highly accurate. There are however some gaps in equality monitoring information, as women are not required to provide this information when accessing services.

Equality monitoring data was not collected as part of the QA research so it is not known the extent to which the findings were wholly representative of the local community.

**Action required:**

*Please see section 6 below, which provides details of how ongoing consultation and engagement will be delivered.*

**6. Wider involvement – have you involved groups of people who are most likely to be affected or interested**


Yes

No

**Please provide detail:**

Officers and partners have been engaging with a full range of stakeholders seeking their views on how to best to develop the approach over recent months. This has included:

- Drawing upon feedback from the Independent Review conducted by academics at the University of Huddersfield, which consulted sex workers, local residents, Elected Members and key partners
- Officer and Member engagement with the community-led 'Listening Well' process which included a series of community meetings focused on resident feedback in relation to on-street sex work and wider community safety issues, followed by the publication of findings
- Local resident and community organisation representatives sharing views through the Holbeck based MA Communications and Engagement Group, chaired and attended by Ward Councillors
- MA 'Silver' partners (responsible for the operational management of the MA) sharing views from an organisational/service perspective as well as views from service users

**Views of sex workers**

Sex workers were consulted in relation to the response to on-street sex work in Holbeck as part of the Independent Review 'IR' (September 2019- July 2020) which found that the majority of sex workers felt the Managed Approach makes them safer. Specific responses from some individuals put this down to males being less likely to commit crimes against them because they know:

- sex workers are 'allowed' to solicit and therefore more likely to report crimes against them to the police without fear of arrest; and
- the authorities are "bothered about" the women (their safety and wellbeing), so if men are violent or otherwise harmful towards them, action will be taken.

Sex worker consultation as part of the IR was conducted pre-March 2020 so is not reflective of the approach that has been in place during the Covid-19 restrictions.

In April/May 2021 sex workers engaged with specialist sex worker support services were asked to share their views on the changes to the MA during Covid-19. The feedback was mixed.

Some women reporting the ongoing support, some of which has been enhanced through Covid-19 related new ways of working, has enable them to sustain a life away from on-street sex work in Holbeck.

Whilst a number of women have stopped working on street a number of them have intimated they would only return occasionally if they really needed to.

Feedback was also received from other women who:

- have continued to work indoors accepting 'riskier jobs';
- have continued to work on-street later at night/in the early hours, or in other areas, to avoid police;

- have continued to work on-street but in residential areas because there is no differentiation in enforcement; and
- have not reported crimes committed against them to the police because of reduced trust or fear of enforcement.

This information was shared with the MA Silver partnership group in their discussions and was considered in the development of the new approach. (*Further information about potential adverse impacts for sex workers, risk mitigation and actions in section 8 below*).

### **Views of the Holbeck community**

Residents and businesses were also consulted as part of the IR., albeit the response rate was somewhat low. In relation to the strategic aim of “*reducing the problems caused by on-street sex work to residents and businesses*”, the key findings were as follows:

- The impact of on-street sex work had become worse, up until the 12 months prior to the research
- Generally, residents and businesses felt that in the 12 months prior to the research, the negative impact had reduced – supported by data relating to the number of calls to the dedicated police line
- Cleanliness in Holbeck had greatly improved

Early in 2019, the Voice of Holbeck (a community group which had representation from 14 local organisations) launched a series of 9 public workshops under their ‘Listening Well’ campaign. Some key findings from this community-led research included:

- the experience, or fear of, being ‘kerb-crawled’ and witnessing sex acts made residents feel less safe and worried about going out alone and/or after dark
- significant local issues also included drug use, street-drinking and anti-social behaviour

More recently, a new MA Communications and Engagement Group has been established, chaired by a Ward Councillor and attended by a wide range of local residents, businesses, churches, schools and third sector organisations that live or operate in Holbeck. This group was consulted on the positive and negative impacts seen and felt as a result the changes to managing on street sex worker during Covid-19, and what they would like to keep or change moving forwards. All were supportive of intensive support continuing for women who sell on street but residents expressed their concerns that if the operational hours and geography were resumed, they may see an increase in soliciting, kerb crawling and sex litter which has decreased since March 2020.

### **Views of the MA partnership**

Views of professionals involved in the delivery of the MA, from a range of different organisations and services, have been sought through discussions with the Executive Member, strategic leads, local Elected Members and MA Silver Accountability Group. The proposed new approach has been developed in partnership with key professionals who have considered the views expressed by sex workers and the local community.

### **Action required:**

To continue to receive stakeholder feedback, in relation to the impact of the new approach through:

- The existing partnership accountability arrangements, which will continue to oversee the strategic and operational delivery of the new approach, and enable:
  - key partners to feed back
  - services providing support to sex workers to seek and share sex worker/service user feedback
- Continued support for, and delivery of, the Holbeck based Communications and Engagement Group to seek ongoing community feedback.

**7. Who may be affected by this activity?**

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

**Equality characteristics**

- |                                     |                             |                          |                           |                          |                           |
|-------------------------------------|-----------------------------|--------------------------|---------------------------|--------------------------|---------------------------|
| <input type="checkbox"/>            | <b>Age</b>                  | <input type="checkbox"/> | <b>Carers</b>             | <input type="checkbox"/> | <b>Disability</b>         |
| <input type="checkbox"/>            | <b>Gender reassignment</b>  | <input type="checkbox"/> | <b>Race</b>               | <input type="checkbox"/> | <b>Religion or Belief</b> |
| <input checked="" type="checkbox"/> | <b>Sex (male or female)</b> | <input type="checkbox"/> | <b>Sexual orientation</b> |                          |                           |
| <input checked="" type="checkbox"/> | <b>Other</b>                |                          |                           |                          |                           |

(**Other** can include – marriage and civil partnership, pregnancy and maternity, and those areas that impact on or relate to equality: tackling poverty and improving health and well-being)

**Please specify:** Sex workers, residents in a priority neighbourhood and the surrounding area

**Stakeholders**

- |                                     |                                                                   |                                     |                  |                          |                     |
|-------------------------------------|-------------------------------------------------------------------|-------------------------------------|------------------|--------------------------|---------------------|
| <input checked="" type="checkbox"/> | <b>Services users</b>                                             | <input type="checkbox"/>            | <b>Employees</b> | <input type="checkbox"/> | <b>Trade Unions</b> |
| <input checked="" type="checkbox"/> | <b>Partners</b>                                                   | <input checked="" type="checkbox"/> | <b>Members</b>   | <input type="checkbox"/> | <b>Suppliers</b>    |
| <input checked="" type="checkbox"/> | <b>Other please specify:</b> residents (predominantly of Holbeck) |                                     |                  |                          |                     |

**Potential barriers**

<input type="checkbox"/>	<input type="checkbox"/>
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Built environment		Location of premises and services	
<input type="checkbox"/>	Information and communication	<input type="checkbox"/>	Customer care
<input type="checkbox"/>	Timing	<input checked="" type="checkbox"/>	Stereotypes and assumptions
<input type="checkbox"/>	Cost	<input checked="" type="checkbox"/>	Consultation and involvement
<input type="checkbox"/>	Financial exclusion	<input type="checkbox"/>	Employment and training
<input type="checkbox"/>	specific barriers to the strategy, policy, services or function		

**Please specify**

**8. Positive and negative impact**  
 Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

**8a. Positive impact:**

As outlined above and in the report, there are no changes proposed to the elements of the MA which partners and stakeholders agree to be beneficial, so the positive impacts of these will continue e.g.:

- The dedicated police patrols,
- The extensive use of monitored public CCTV,
- Late night Safer Leeds high visibility mobile and foot patrols
- Outreach activity and the full range of support all services assisting the women currently provide
- Dynamic and dedicated street cleansing capability

The additional positive impacts are expected for sex workers and the Holbeck community:

The number of sex workers currently operating on street in Holbeck is significantly lower than pre-March 2020 and this is in part due to the development of an enhanced service offer which has supported women to maintain a reduction in on street sex working – or to not need to sell sex on street at all – during the pandemic. The proposal not to re-introduce the defined operational hours of the MA area seeks to maintain this good progress by avoiding a scenario whereby soliciting is ‘allowed’ again and thus encourages people to come back to the area to buy or sell sex. As recommended by the Independent Review, the new approach will continue to see the same high level of investment in support for sex workers which will continue to reduce harm and improve outcomes for individuals who are often in highly vulnerable circumstances, whilst maintaining a reduction in the overall

numbers of individuals working on street.

Community engagement identified anti-social behaviour e.g. street drinking, and kerb-crawling as two significant concerns of local residents. The work currently being progressing to seek a Public Space Protection Order (PSPO) which, if granted, will prohibit street-drinking and other anti-social activities, seeks to reduce such community nuisance and thus have a positive impact on residents who are affected by the adverse impact of anti-social behaviour. Additionally, by using all available powers to prevent males from soliciting on street for the purpose of paying for sex ('kerb-crawling'), it is intended that kerb-crawling will significantly reduce and residents, particularly females, will feel safer in their local community.

Residents have also expressed strong concerns about the perception of Holbeck as a 'legal red light district', a phrase which is factually inaccurate but regularly used in local and national media. Many felt that this sends a message that kerb crawling in residential areas of Holbeck is acceptable and also gives a negative impression of the area as a whole. It is likely that by not reintroducing the operational hours and geography the misinterpretation of Holbeck as a 'legal red light district' will cease to be reinforced.

**Action required:**

To continue to monitor the impact of the proposed changes on sex workers and local residents, using a wide range of data and intelligence, to ensure that the intended positive outcomes are as predicted based on the evidence considered in developing the new approach.

**8b. Negative impact:**

Although the defined operational hours of the MA have not been active since March 2020, the proposed changes do reflect a significant change in what has been the approach to managing on street sex work in Holbeck since 2014, and this change will be particularly significant for women who sell sex on street.

The introduction of the MA helped to build trust between sex workers and the police, and the reduced likelihood of enforcement coupled with the police role in safeguarding, has been fundamental in increasing the confidence of many on-street sex workers to report crimes committed against them. Furthermore, having a defined geography and specific hours better enabled outreach services to locate and engage with women, build their trust and confidence, and support them to access a wide range of services to improve their safety, health and wellbeing.

There is a risk that the removal of the defined operational hours/area will negatively impact on the relationship with sex workers and the police. This could result in a reduction in crimes reported which can ultimately prevent violent perpetrators from being brought to justice. The lack of the defined operational hours/area may also mean it is harder for outreach services to locate women, which could reduce their engagement with the support offer.

Arrangements will be in place to mitigate against these risks. The police focus when engaging sex workers will continue to be focussed on safeguarding and the police Sex

Worker Liaison Officer who has an existing strong, positive reputation within the sex work community will continue to engage with and support women. Partnership weekly tasking meetings will continue to take place which involve intensive case management of individuals known to be working. If disengagement occurs, partners will work together to formulate appropriate action plans for each individual.

In addition, the increased enforcement of kerb-crawlers could result in the displacement of on-street sex work to areas where purchasers are less visible to police, Safer Leeds patrol officers and CCTV cameras and less likely to be seen by passers-by. It may also lead to women working in riskier indoor circumstances to avoid enforcement (for themselves or purchasers). This could increase the vulnerability of sex workers.

Displacement will be closely monitored and responded to appropriately. All services will be responsive and ensure that safeguarding and support is available to sex workers wherever sex work presents. Risk increases when sex workers are in greatest need, so the intensive case management approach will continue to seek to reduce the need to sex work on street by ensuring the needs which drive their sex working can be otherwise met (e.g. accommodation, drug treatment, food parcels, clothing).

**Action required:**

To continue to monitor data and quantitative/anecdotal evidence for impact on the:

- the number of crimes against sex workers which are reported by sex workers to the police
- the number of women known to be sex working and the number of those women engaged with services
- displacement of kerb-crawling to other areas

**9. Will this activity promote strong and positive relationships between the groups/communities identified?**

Yes

No

**Please provide detail:**

The relationship between sex workers in Holbeck, and the wider Holbeck community is complex. Many people from the local community have expressed empathy for sex workers and are extremely keen to ensure sex workers can access appropriate services. Similarly, sex workers have expressed their understanding of the impact on street sex worker can have on the community.

However, there have also been reports of negative interactions between residents and sex workers and in particular, when soliciting is taking place in residential areas. It is likely that this is exacerbated by the concerns residents have expressed about kerb-crawling.

The new approach intends to reduce kerb-crawling and soliciting in residential areas and therefore reduce the negative relationship that can present between sex workers and local

residents.
<b>Action required:</b> None (any specific concerns will be observed through feedback and other monitoring arrangements).

<b>10. Does this activity bring groups/communities into increased contact with each other?</b> (for example, in schools, neighbourhood, workplace)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Please provide detail:</b> N/A
<b>Action required:</b> N/A

<b>11. Could this activity be perceived as benefiting one group at the expense of another?</b> (for example where your activity or decision is aimed at adults could it have an impact on children and young people)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Please provide detail:</b> Because this represents a significant change to policy which affects the way in which sex workers are 'allowed' to work, it is possible that the sex working community may perceive the changes as having positive impacts for the community, but negative impacts for themselves.
<b>Action required:</b> The dedicated policing team, the Sex Worker Liaison Officer and the specialist sex worker support services will work closely with women to help them understand the changes being made, the rationale for these changes and the support that is available to them to reduce the short-term impacts and improve their long-term safety and health.

## 12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
<p>To continue to receive stakeholder feedback, in relation to the impact of the new approach through:</p> <ul style="list-style-type: none"> <li>• The existing partnership accountability arrangements, which will continue to oversee the strategic and operational delivery of the new approach, and enable: <ul style="list-style-type: none"> <li>○ key partners to feed back</li> <li>○ services providing support to sex workers to seek and share sex worker/service user feedback</li> </ul> </li> <li>• Continued support for, and delivery of, the Holbeck based Communications and Engagement Group to seek ongoing community feedback.</li> </ul>	<p>Ongoing, but considered at every regular meeting of the following:</p> <p>Partnership accountability group (monthly)</p> <p>Communications and Engagement Group (bimonthly)</p>	<p>Stakeholder feedback</p>	<p>Paul Money, Chief Officer Safer Stronger Communities (Safer Leeds)</p>
<p>To continue to monitor the impact of the proposed changes, using a wide range of data and intelligence, to ensure that the intended positive outcomes are as predicted based on the evidence considered in developing the new approach.</p>	<p>Monthly (with analysis of longitudinal change)</p>	<p>Stakeholder feedback (as above), plus data and intelligence provided by a wide range of partners and collated by Safer Leeds Intelligence Service e.g. crime data, PSPO enforcement data, calls to the dedicated policing team,</p>	<p>Paul Money, Chief Officer Safer Stronger Communities (Safer Leeds)</p>

Action	Timescale	Measure	Lead person
		numbers of sex workers sighted soliciting etc.	
<p>To continue to monitor data and quantitative/anecdotal evidence for impact on the:</p> <ul style="list-style-type: none"> <li>• the number of crimes against sex workers which are reported by sex workers to the police;</li> <li>• the number of women known to be sex working and the number of those women engaged with services; and</li> <li>• any displacement of kerb-crawling to other areas.</li> </ul>	Monthly (with analysis of longitudinal change)	Partnership data as described.	Paul Money, Chief Officer Safer Stronger Communities (Safer Leeds)
<p>The dedicated policing team, the Sex Worker Liaison Officer and the specialist sex worker support services will work closely with women to help them understand the changes being made, the rationale for these changes and the support that is available to them to reduce the short-term impacts and improve their long-term safety and health.</p>	As soon as possible after the new approach is approved	Sex worker feedback	Inspector Lucy Leadbeater – WYP

**13. Governance, ownership and approval**

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job title	Date
Paul Money	Chief Officer, Safer Stronger Communities (Safer Leeds)	09.06.21
<b>Date impact assessment completed</b>		09.06.21

**14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)**

- As part of Service Planning performance monitoring
- As part of Project monitoring
- Update report will be agreed and provided to the appropriate board  
Please specify which board
- Other (please specify)

**15. Publishing**

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality impact assessment should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality impact assessments that are not to be published should be sent to [equalityteam@leeds.gov.uk](mailto:equalityteam@leeds.gov.uk) for record.

Complete the appropriate section below with the date the report and attached assessment was sent:

For Executive Board or Full Council – sent to <b>Governance Services</b>	Date sent:
For Delegated Decisions or Significant Operational Decisions – sent to appropriate <b>Directorate</b>	Date sent:
All other decisions – sent to <a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>	Date sent: