

## No cold calling zones

### Evidence based equality analysis

#### Main aims, purpose and outcomes and how does it fit in with the wider aims of the organisation:

To introduce and manage appropriately targeted, intelligence led no cold calling zones as a proactive deterrent to doorstep crime. Doorstep crime encompasses rogue traders, bogus sellers and distraction burglary. The core objective is crime prevention or reduction (including reducing the fear of crime) to protect the elderly and vulnerable residents of the borough.

No cold calling zones are designated zones where residents have collectively stipulated that they do not want cold callers at the door. This is reflected through signage in the area and at the properties concerned. All no cold calling zones are set up in accordance with Office of Fair Trading guidance and best practice which lays out certain requirements for a zone to be implemented including:

The core objective is crime prevention or reduction

There is a real prospect that the zone will achieve this objective

An identified problem in relation to crime exists

The size of the zone corresponds to the geographical scope of the identified problem

Consideration is given to what cold calling activities should be caught by the zone

There is a high concentration of consumers who are vulnerable to exploitation

There is consultation with householders

The zones are designed to act as a deterrent to cold callers and specifically individuals or traders selling goods or services. The zones are implemented to empower householders to be able to say “no” and to know who to report an incident to (Trading Standards and Police). It is important to note that a doorstep crime incident that occurs in a no cold

calling zone will be treated in the same way as one that is not i.e. a rapid response to a reported incident and the appropriate action taken. A no cold calling zone is a deterrent and educational tool as opposed to an enforcement measure. It is based completely on the wishes of the householders in the area in question who have formed part of the consultation process prior to the implementation of the zone.

**Lead officer:** Gaynor Roberts

**Stakeholders:** General public, police, Office of Fair Trading, Trading Standards Institute

Equality analysis is a valuable tool to help embed equality into everything we do

While process is important, equality analysis is essentially about outcomes.

Lack of evidence of discrimination is not evidence of a lack of discrimination.

It is not acceptable to say that a policy is applied uniformly to all groups and is therefore fair and equal. Applying a policy or procedure consistently may result in differential outcomes for different groups.

For each of the areas overleaf, an assessment needs to be made on whether the policy has a **positive, negative or neutral impact**, and brief details of why this decision was made and notes of any mitigation should be included. Where the impact is negative, this needs to be given a **high, medium or low assessment**. It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** –some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>
Target group / area			
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers, asylum seekers etc.)		Access to the Big Word translation service.	Potential impact on Gypsies and Travellers who obtain business through doorstep cold calling.

		<p>Contact with borough Gypsy and Traveller liaison officer.</p> <p>No cold calling zones are applicable to all cold callers regardless of race; other businesses will be equally affected by this measure not just Gypsies and Travellers. No cold calling zones are intelligence led and set up as a result of the wishes of the householders and the level of vulnerability.</p> <p>New employees to the service receive diversity training.</p>	<p>Low impact – No cold calling zones are applicable to all cold callers regardless of race, other businesses will be equally affected by this measure. Also the number of areas covered by zones is a very small area within Cheshire West.</p>
<p><b>Disability</b> (as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)</p>	<p>The same level of access to our Service for vulnerable residents is provided whether in a no cold calling zone or not, zones are more of a deterrent than an enforcement</p>	<p>Householders with a physical or mental disability may be considered vulnerable and therefore more likely to be a victim of doorstep crime – policy seeks to protect those people.</p> <p>Staff are trained in the use of text relay, a telephone support service for deaf people.</p> <p>Personal visits are made to consumers when appropriate as in accordance with their needs.</p> <p>Public offices are wheelchair accessible and city centre based</p>	<p>Low impact Office of Fair Trading criteria for no cold calling zone to be established states that there must be a high concentration of consumers who are particularly vulnerable to exploitation (including consumers who have a higher propensity to be misled) within the area. Vulnerability is based on age, mental capacity and previous history of cold calling incidents ( e.g. repeat victims)</p>

		<p>near main bus stops.</p> <p>Hearing loops/British Sign Language interpreters available on request</p> <p>We have proactive measures in place to educate our most vulnerable consumers and people that may come into contact with them e.g. social services, family based carers, voluntary groups</p>	
<b>Gender/gender reassignment</b>	No issues identified		
<b>Religion and belief</b>			<p>Religious callers may be concerned that they cannot cold call in no cold calling zone area. Low impact – no cold calling zones are designed to act as a deterrent to rogue traders who are selling goods or services. Religious callers not selling products do not fall within the remit of a no cold calling zone. This information is made clear to all in the zone areas.</p>
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual)	No issues identified		
<b>Age</b> (children and young people)		Consumer education is provided	Elderly people may be more

<p>aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older older people 81+. The age categories are for illustration only as overriding consideration should be given to needs)</p>		<p>to older people through links with Age UK, social services, police and other relevant agencies to raise awareness of doorstep crime and encourage the reporting of incidents.</p> <p>Age UK in conjunction with Cheshire West Trading Standards Service promote a trader register which provides a list of reputable local traders who provide maintenance and repair work to peoples homes and gardens.</p>	<p>vulnerable and therefore more likely to be affected by doorstep crime.</p> <p>Low impact - Office of Fair Trading criteria for no cold calling zone to be established states that there must be a high concentration of consumers who are particularly vulnerable to exploitation (including consumers who have a higher propensity to be misled) within the area. Vulnerability is based on age, mental capacity and previous history of cold calling incidents (e.g. repeat victims)</p>
<p><b>Rural communities</b></p>		<p>Home visits are made where appropriate.</p>	<p>No cold calling zones are not common in rural areas. Low impact – no cold calling zones are intelligence led and are consequently set up where needed. Rural areas are not as commonly affected, however if intelligence supported the request for a zone in a rural area they would be assessed against the same criteria.</p>
<p><b>Areas of deprivation</b></p>			<p>Deprived areas may be more likely to be targeted for property repair work.</p> <p>Low impact – zones are intelligence led, and if an identified problem is established</p>

			a no cold calling zone can be implemented.
<b>Human Rights</b>		<p>Under section 2 of the Local Government Act 2000 local authorities have the power to do anything which they consider is likely to achieve any one or more of the following objectives a/ the promotion or improvement of the economic wellbeing of their area b/ the promotion or improvement of the social wellbeing of their area c/ the promotion or improvement of the environmental wellbeing of their area.</p> <p>Acting to establish or support a no cold calling zone is likely to fall within these powers where the authority considers that its actions will achieve the promotion of these objectives.</p>	<p>Gypsies and Travellers may argue that no cold calling zones affect their right to work (article 23)</p> <p>Low impact – zones are set up with the express wishes of all householders and consumers have the right to respect for private and family life, home and correspondence (article 8).</p>
<b>Health and Wellbeing</b> (consider both the wider determinants of health such as education, housing, employment, environment, crime and transport, as well as the possible impacts on lifestyles and the effect there may be on health and care services)		<p>Cold calling can have a detrimental effect on older people who have been taken advantage of by rogue traders.</p> <p>Low impact – zones are intelligence led, and if an identified problem is established a no cold calling zone can be implemented.</p>	
<b>Procurement/Partnership</b> (if	Not applicable		

project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)			
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**Evidence:**

Office of Fair Trading Guidance available.

**Action plan:**

<b>Actions required</b>	<b>Key activity</b>	<b>Priority</b>	<b>Outcomes required</b>	<b>Officer responsible</b>	<b>Review date</b>
Provide education to appropriate consumers regarding cold calling and no cold calling zones	Talks to consumer groups and carers groups advising of cold callers and zones when they may be appropriate	Low	Older Cheshire West consumers being more aware of concerns in relation to cold callers	Gaynor Roberts	April 2015
Check current no cold calling zones are running satisfactorily	Review of all current no cold calling zones.	Low	Ensure that all no cold calling zones are still operating effectively	Lisa Nicholson	April 2016
Create a victim support charter for victims of doorstep crime.	Establish a charter giving a clear guidelines on how elderly and vulnerable victims of doorstep crime should be supported	Low	Minimising the stress experienced by the victims of doorstep crime	Steph Scott	April 2015
Raise general awareness of no cold calling zones	Consider how best to communicate this to householders	Low	Residents aware of no cold calling zones	Gaynor Roberts	April 2015

<b>Sign off</b>	
Lead Officer:	Gaynor Roberts
Approved by Head of Service:	Vanessa Griffiths
<b>Moderation and/or Scrutiny</b>	
Date:	Moderated at directorate equality meeting 15 May 2013
<b>Date analysis to be reviewed based on rating</b> (high impact – review in one year, medium impact - review in two years, low impact in three years)	Review in three years

**Please forward the completed Equality Analysis to the Equality and Diversity Managers for publishing on the Council's website**