

Customer Impact Screen



Topic	Draft Events Policy
For decision by (name and date)	Cabinet 20/10/2016
Date of screening assessment	July 2016
Date of this assessment	September 2016
Author	Suzie Hooper

protected characteristics	Negative Impact		Benefits		Evidence
	Yes	No	Yes	No	
					<ul style="list-style-type: none"> Briefly describe initial thoughts on who will be affected and how (positively & negatively) What evidence/data have you used to inform your judgement? Highlight which protected characteristics will require full analysis based on the screening process, including details of issues you need to explore further – if full analysis is not required please explain why.
Age		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Gender (Sex)		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Disability		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Race		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Sexual Orientation		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Gender Reassignment		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire

					communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Pregnancy & Maternity		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Religion & Belief		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Marriage & Civil Partnership		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive.
Socio-economic/ social inclusion		X			One of the objectives for TDC encouraging the hosting of events across the district is to enable and empower local groups to organise effective events that widen community participation, develop a sense of local pride and inspire communities to come together. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive. Changes in the fees and charges for putting on an event will ensure a fair and consistent approach to event organisers.

Where any issues are identified, a full Customer Impact Assessment should be completed on issue using the pages that follow (delete if not required). It is important to remember that the screening and full analysis processes should begin at the start of a piece of work. Analysis at the end of a project, after a decision is made or when the report is going to Members will not satisfy the Public Sector Equality Duty. Attach this screening document and full impact assessment as an annex to your report to Members.

Customer Impact Assessment

Topic	Draft Events Policy
For decision by (name and date)	Cabinet 20/10/2016
Date of screening assessment	July 2016
Date of this assessment	September 2016
Author	Suzie Hooper
Assessment Team	Suzie Hooper and Claire Grant

Detailed analysis	
Issue 1	<p>The Introduction of an Events Policy and new procedures.</p> <p>Thanet has historically had a popular and varied event calendar due to its creative and cultural heritage. The quantity of events has been growing in recent years and our role is to enable event organisers through the processes of planning, organising and running an event. There hasn't been a clear policy and set of procedures on Events and therefore the new Events Policy will ensure consistent approaches and ensure that there is a rigorous process with a robust policy.</p> <p>Events play a vital part of the visitor experience that Thanet aspires to achieve and they help draw visitors to Thanet as a destination. They are also an essential part of building and bringing together local communities.</p> <p>The policy endeavours to clearly outline the role of the Council in Events within Thanet, the role of the Event Safety Advisory Group (a multi-organisation group) and to give a framework for the processes required of the Event Organiser.</p>
Stakeholders/interested parties	<p>Stakeholder Analysis carried out identified the following members: Staff, Internal departments, Event Organisers, Event Safety Advisory Group(ESAG) members, Parish Councils, Town Councils, Town Teams, Businesses, Community Groups, Members and external agencies.</p>
Consultation & Engagement	<ul style="list-style-type: none"> • Through numerous site visits to events, we have engaged in multiple conversations where Event Organisers give comments about the event and the processes that they have gone through to plan, organise, deliver and review their event. • After some events, debriefs are held with the Event Organisers where we and the Event Organisers receive

feedback and recommendations for future events and these feed into the constant review of our policies and procedures.

- We have attended Event Organiser Group meetings where we have given them updates on the review of policies and procedures and listened to comments and answered questions regarding procedures so that they have been involved in the development of the Events Policy.
- We have engaged with the ESAG members to improve and streamline ESAG and we involved members in their ESAG review which was part of the Events Policy. We gave a presentation on the review and members gave agreement for changes and provided written input into the new Terms of Reference and were asked to supply the relevant contact details for membership.
- Meetings with Events Team, Line Manager and Head of Service on reviewing and improving policies and procedures.
- Discussed with internal departments for guidance, legislation, department policy, input on fees and charges. Individual departments gave input on operational improvements.
- All Heads of Services were sent the Draft Events Policy and this was disseminated through their departments to the relevant staff.
- The Draft Policy went to the Corporate Management Team where recommendations were incorporated into the document their agreement was given for it to go out for engagement.
- CMT requested that the Events Draft Policy was sent out to Councillors which happened for a two week period from 01/07/2016 to 15/07/2016.
- Received an e-mail from the Customer Contact and Engagement Officer with recommendations from an equality perspective on 13/06/2016.
- Held a meeting with Communications and Corporate Resources on 05/07/2016 to discuss releasing the Draft Events Policy for engagement and awareness raising process.
 - We discussed points raised on the Draft Event Policy including a centralised invoice, website updates, online documentation and fees and charges.
 - A stakeholders list was presented from the stakeholder analysis and groups were agreed for the Events Policy to be disseminated to. Points on the Engagement and Awareness Raising process included having the Draft Events Policy on line with direct comments being sent to events@thanet.gov.uk It was suggested to encourage Councillors to get groups involved with engagement. It was agreed that as part of this engagement process would be the Overview and Scrutiny Panel which would be incorporated as part of this process. They would be treated as a consultee
- Attended several Kent Safety Advisory Steering Group Meetings and gained information and comments from other authorities regarding their policies, procedures, fees and charges.

	<ul style="list-style-type: none"> • mentioned that his experience had been that the paperwork was quite significant and involved repetition. The new policy has amalgamated the Event Notification Form and Land Hire Form into one form to reduce repetition. This was similar feedback to previous comments that had been received when dealing with event organiser throughout the review period. • There were three terms being used to describe the type of land, private, public and council. An Event Organiser suggested just using two, which has now been implemented in Section 3.0 so that land is referred to as either private or council. • Contacted other authorities to share information regarding our policies and procedures and theirs. Comparing different authorities such as Shepway, Brighton, Dover, Canterbury, Folkestone and Lambeth. • At the Overview and Scrutiny Panel it was agreed that the word consultation should be replaced with terminology of engagement and awareness raising. In section 22.0 Communication and Engagement of Events the policy stated that the process may include consulting with.....on the panel's recommendation this has been amended to the process will include engagement with. • During the Overview and Scrutiny Panel meeting it was commented that the Events Policy was very good reading, incorporating many things that had been missing and mopped up many previous concerns. • A comment from an event organiser who has used the current system for filling out the event paperwork
<p>Data sources and evidence</p>	<ul style="list-style-type: none"> • The Council has legal duties and enforcement powers under the Health and Safety at Work Act 1974 and the associated provisions. All events must conform to relevant legislation and guidance and these were researched through the internet, other authorities' recommendations for example Dover's Event Policy. The Council coordinates and consults with the local ESAG to assist Event Organisers in the discharge of these statutory duties. Guidance and legislation has been provided by ESAG members in the content of the Events Policy, within the Event Documentation and The ESAG Terms of Reference. • Many discussions from Event Organisers were focused on marketing their events and where they could place banners within the District. As a result of this, working in partnership with the Tourism department a marketing and promotional guidance sheet has been produced to be incorporated within the Events Toolkit. There were many meetings and discussions with planning enforcement including a meeting at the Ramsgate Event Organisers Meeting to explain legislation to the Event Organisers and to propose the change in process within the policy for TDC to apply for advert consent on specified sites. • In July 2016 a Councillor raised some points regarding the impact of Events on waste and cleansing and we were able to direct them to the five relevant sections within the Events Policy and Appendices to answer those queries.

	<ul style="list-style-type: none"> • When writing the new Terms of Reference for ESAG, there was a question raised in May 2106 about representation on the membership, so this question was sent out to the Kent ESAG members and responses informed TDC on the approaches by other authorities. • We attended ESAG training and Kent ESAG training which informed the review and policy with guidance on legislation and documentation to ensure a consistent approach across the County. • Advice from East Kent Housing was received in April after consultation over the Events Policy clarifying the required policies for events using land managed for the Council by them. • Environmental Protection have been heavily involved in producing information for the Events Policy principally concerned with noise and odour impacts and give advice in regard to mitigation. They will work with Event Organisers to assist them in avoiding potential statutory nuisances, which also then protects the audiences and community. • The Policy has been reviewed by the Policy Officer and an update on the RIDDOR was highlighted and then implemented into the documentation along with updates on terminology. • KCC Highway Authority reviewed and consulted on the Events Policy with clarification on authority between them and the Police. • A Safety Management Company noted that in section 9 of the policy, it referred to the HSG 195 guidance which has been superseded, therefore the policy has been updated with the statement that all events will be required to comply with the guidance provided by the Health and Safety Executive at http://www.hse.gov.uk and reference to the Purple Guide from the Events Industry Forum.
<p>Protected Characteristic(s) affected</p>	<ul style="list-style-type: none"> • The Council works with a diverse range of event organisers from a variety of different cultures and backgrounds. We are committed to assist event organisers to deliver a provision of multi-cultural events promoting community cohesion. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive. • The policy supports the ability of events to contribute towards the council’s equality duties including: <ul style="list-style-type: none"> - Advance equality of opportunity between people who share a protected characteristic and those who do not; and - Foster good relations between people who share a protected characteristic and those who do not. Events can do this by:

	<ul style="list-style-type: none"> - Removing or minimizing disadvantages suffered by people due to their protected characteristics. - Taking steps to meet the needs of people from protected groups to participate in public life or in other activities where their participation is disproportionately low. <ul style="list-style-type: none"> • It would be the responsibility of the Event Organiser that in relation to socio-economic/social inclusion issues there is accessibility to all. • During the engagement process an event organiser asked for clarification on what a protected characteristic is. In response to this the list of protected characteristics has been listed in the policy after the term is used. • An Event Organiser commented on the definition of a Community event as having the references of examples as restrictive. In Section 6.0 an amendment has been made to include parades including Carnivals and Remembrance Day. •
Impacts Identified	<ul style="list-style-type: none"> • Event Organisers currently obtain some information from the website, the majority of the documentation through e-mail and a large amount of the processes and procedures explained through e-mail or telephone. • The new Events Policy and procedures will enable Event Organisers to access all information on the website and complete forms online. This will enable them to go through the process more independently and efficiently. There may be some Event Organisers not confident in some of these new procedures, however workshops will support and guide them through this. There will be an Events Toolkit that will give them guidance, information and links to organisations and services that can support them. • There is no existing Events Policy or clear procedures in a written or diagrammatic format. • The Event Journey gives clear timeframes which Event Organisers will need to follow. If these timeframes are not reached then there will be consequences that may affect their event however there has to be a consistent approach to make this fair to all Event organisers and to also support the officers and ESAG members that are involved in the event process. • An event organiser commented that the request for Event notification and completion of documentation 14 weeks prior to the event and is not reasonable, they suggested a minimum of four weeks prior to the event. The 14 weeks has been set due to KCC Highways requiring a minimum of 12 weeks standard notification for utilities work on the highways. The additional two weeks is so that the application can be submitted, the

	Events team can coordinate the documentation and follow up on any missing detail and check availability.
Mitigation options, reasonable adjustments and potential solutions	<ul style="list-style-type: none"> • To ensure a process is easy to follow and where required meetings or resources are provided in appropriate and accessible formats. • To provide workshops to give Event Organisers guidance through the new Event Policy and the processes involved. Practical demonstrations and examples of how to complete the Event process. • To provide an improved website that gives more information about the processes and guides the Event Organiser through the processes.
Final recommendation for this issue	<p>Introduce a new Events Policy and procedures which would be made available and accessible to all Event Organisers and other Stakeholders.</p> <p>The Overview and Scrutiny Panel agreed the proposal for the new events policy to be presented to Cabinet.</p>
Aims of the Duty furthered by this recommendation	<p>The Events Policy aims to meet the duty to:</p> <ul style="list-style-type: none"> • Advance equality of opportunity between people who share a protected characteristic and those who do not. • Foster good relations between people who share a protected characteristic and those who do not. <p>Events can do this by:</p> <ul style="list-style-type: none"> • Eliminate Unlawful discrimination – harassment, victimisation & any other conduct prohibited by the Act. The Events Policy furthers this aim of the duty by ensuring the opportunity for inclusiveness for all stakeholders. • Advance Equality of Opportunity by: Removing or minimising disadvantages suffered by people due to their protected characteristics Taking steps to meet the needs of people from protected groups where these are different from the needs of other people. Encouraging people with protected characteristics to participate in public life or in other activities where their participation is low. <p>This recommendation supports a wide range of events and activities throughout the District encouraging community cohesion.</p>

Issue 2	Introduction and change of Event Fees and Charges
----------------	--

	<p>The quantity of events has been growing in recent years and TDC recognises the economic impact events bring to the local economy. However there are costs and additional services that may be required for processing events.</p> <p>As highlighted in the Corporate Plan, events play a key role in providing not only local and economic benefits. With over 215 events delivered last year and an increase for 2016, these help to promote Thanet as a visitor destination. Tourism contributes at least £245 million to the Thanet economy each year supporting 5,932 jobs (Cambridge Model Economic Impact Survey 2013) with more than 3.36 million visitors exploring the area.</p> <p>Events currently incur the Council costs relating to officer time, resources used and services provided, which the policy proposes to give clear guidelines and improvements on how we can recover some of these costs. (Refer to Appendix 7 and 8 in the Draft Events Policy)</p> <p>New fees and charges will be put in place for the new budget year 2017/2018.</p>
<p>Stakeholders/interested parties</p>	<p>Stakeholder Analysis carried out identified the following members: Staff, Internal departments, Event Organisers, Event Safety Advisory Group(ESAG) members, Parish Councils, Town Councils, Town Teams, Businesses, Community Groups, Members and external agencies.</p>
<p>Consultation & Engagement</p>	<ul style="list-style-type: none"> • Through numerous site visits to events, we have engaged in multiple conversations where Event Organisers give comments about their event and the processes that they have gone through to plan, organise, deliver and review their event. We receive comments about the current land hire fees and the fees and charges section within the Events Policy gives clear guidance and explanation • We have attended Event Organiser Group meetings where we have given them updates on the review of policies and procedures and listened to comments and answered questions. • Meetings with Events Team, Line Manager and Head of Service on reviewing the fees and charges. • Discussed with internal departments for guidance and costings for their input on fees and charges. Individual departments gave input for example, waste management, parking, building control, East Kent Housing and Licensing. • All Heads of Services were sent the Draft Events Policy and the e-mail highlighted that we would like to consult with departments with particular focus on three areas, fees and charges being one of those highlighted. This was disseminated through their departments to the relevant staff. • The Draft Policy along with the fees and charges went to the Corporate Management Team where recommendations on three areas related to fees and charges were incorporated into the document • Councillors have seen the fees and charges in their two week period of engagement from 01/07/2016 to 15/07/2016 and comments have been responded to.

	<ul style="list-style-type: none"> • Several meetings and discussions from the Customer Contact and Engagement Officer with recommendations from an equality perspective. • Held a meeting with Communications and Corporate Resources on 05/07/2016 to discuss releasing the Draft Events Policy for engagement and awareness raising process. <ul style="list-style-type: none"> - We discussed points raised on the Draft Event Policy including fees and charges. - Stakeholder groups will have the Events Policy including the fees and charges disseminated to them. This information will be on line with direct comments being sent to events@thanet.gov.uk - As part of this engagement process the Overview and Scrutiny Panel would be incorporated as part of this process being treated as a consultee. Feedback from the Overview and Scrutiny panel will be discussed in the Equality Impact Assessment and recommendations made accordingly. • Attended several Kent Safety Advisory Steering Group Meetings and gained information and comments from other authorities regarding their fees and charges. • Contacted other authorities to share information regarding our fees and charges and compare to theirs for benchmarking. Comparing different authorities such as Shepway, Brighton, Dover, Canterbury, Folkestone and Lambeth. • Overview and Scrutiny Panel requested clarification on the fees and charges for collection of bins. The Waste and Recycling team were consulted and changed the charge for delivery of bins from £5 to £20 to reflect a more realistic charge that would cover costs including transport and staff time. It was also clarified that this charge is for the delivery of additional bins of any size and any number of bins in one delivery. It was clarified that the collection of waste is based on each visit to the site and for each bin collected. From the feedback from the Overview and Scrutiny Panel, the chart for the Fees and Charges for additional resources was amended to reflect that the charge for the provision of street cleaning for events was for additional cleaning. • The fees and charges were presented to the Overview and Scrutiny Panel and it was recognised that cuts have been enforced on the Council and therefore there are limited resources. Therefore the approach for recouping the additional costs incurred for additional services provided for events was for cost recovery. • An event organiser approached the team with confusion about the fees and how this would affect their costs for future events. A telephone conversation was held with a discussion that clarified the points raised and they went away with a clear understanding of what charges they would have with the proposed fees and charges.
<p>Data sources and evidence</p>	<ul style="list-style-type: none"> • Discussions from Event Organisers highlighted that some were not clear on what the land hire charge was for, what it covered and why it was there. Therefore there is a clear section within the Events Policy that gives clear guidance to the fees and charges and explains what these charges cover. The Events Fees Table and Fees and Charges for Additional Resources Tables were created to give clear information about

	<p>all fees and charges that may be relevant to an Event Organiser putting an event on within the District.</p> <ul style="list-style-type: none"> • In July 2016 a Councillor raised some points regarding the financial impact and resource implications of Events on waste and cleansing. By directing them to the five relevant sections within the Events Policy and Appendices these queries were answered. • We have accessed information on fees and charges from other authorities within the County and also outside of the County to enable comparisons. We have taken this data into consideration when formulating our policy on Event fees and charges; however there are many different approaches across different districts and our charges come much lower than some districts. • The fees and charges for additional resources have all been provided by staff within the relevant departments and organisations with costings of what that resource costs their service and so is therefore proposed for recharge. • The charge for electricity and water has not been set yet, as there is currently a review on the supply of electricity and water within the district and therefore recharging is part of this review process. • Advice from East Kent Housing was received in April after consultation over the Fees and Charges within the Events Policy and this was incorporated into the Fees and Charges for Additional Resources table for 2016-2017. • The figures are based on 2016 figures and will be subject to annual review and could be altered in the future.
<p>Protected Characteristic(s) affected</p>	<ul style="list-style-type: none"> • The Council works with a diverse range of event organisers from a variety of different cultures and backgrounds. We are committed to assist event organisers to deliver a provision of multi-cultural events promoting community cohesion. The events policy recognises the diversity of our district and all events work to ensure that everyone has the same opportunities and they are inclusive. • The policy supports the ability of events to contribute towards the council's equality duties including: <ul style="list-style-type: none"> - Advance equality of opportunity between people who share a protected characteristic and those who do not; - Foster good relations between people who share a protected characteristic and those who do not. Events can do this by:

	<ul style="list-style-type: none"> - Removing or minimizing disadvantages suffered by people due to their protected characteristics. - Taking steps to meet the needs of people from protected groups to participate in public life or in other activities where their participation is disproportionately low. <ul style="list-style-type: none"> • It would be the responsibility of the Event Organiser that in relation to socio-economic/social inclusion issues there is accessibility to all. • To encourage various groups and organisations to work together and share their experiences and knowledge and give them the tools with consistent and straightforward processes to enable them to research funding avenues for their events.
Impacts Identified	<ul style="list-style-type: none"> • There is currently a land hire fee that is charged according to the event type. There is no charge to cover the cost of support from officers or administration time for processing an event. <p>There are costs and additional services that may be required to the Council for processing events and the use of Thanet District Council Land. Most of these are currently not recharged and the Events Policy introduces a framework for these to be recharged. Event Organisers may be impacted by these charges, however through the engagement workshops there will be guidance on how to incorporate these costs into their budgets when seeking funding avenues.</p> <ul style="list-style-type: none"> • Event organisers currently access information regarding fees and charges within the Land Hire form which is available via e-mail or on the website. The Events Policy and fees and charges will be clearly available on the website in the future. • The new Events Policy will provide a framework that guides the Event Organiser through the relevant fees and charges to their individual event and how they contact relevant departments and organisations to arrange for those services and resources. • We anticipate that there may be some issues around affordability but impacts will be assessed on receipt of stakeholder feedback. • Event organisers have approached the team regarding the changes and increases in the fees and charges enquiring about the impact on the costs for their event with the new system. Comparisons from the previous system and the proposed system have been conducted. There is the introduction of an application fee which has not been charged before. Mainly the hire fee has increased and therefore with the additional

	<p>application fee, the percentage increase can be seen to be high. The fees for additional resources are also an additional cost that in the majority has not previously been paid. However these are from different services and departments and come under their fees and charges. To the event organiser it is perceived that there is a large increase in the Event fees and charges, however these are across departments and for different services/resources.</p> <ul style="list-style-type: none"> • In the Memorandum of Agreement (Appendix 4) it states “<i>No collections (whether for charity or otherwise), games of chance, sweepstakes, sale of programmes, raffles or lotteries or gambling of any kind can be conducted at the Venue without the prior written consent of the Council</i>”. Feedback from an event organiser queried how groups would be able to fundraise. An amendment has been made to include that the permission and licenses can be sought through applying for a street permit from the licensing department. So providing they apply for a permit, there should be no effect on their fundraising.
<p>Mitigation options, reasonable adjustments and potential solutions</p>	<ul style="list-style-type: none"> • To ensure a process is easy to follow and where required meetings or resources are provided in appropriate and accessible formats. • To provide workshops to give Event Organisers guidance through the new fees and charges process within the new Event Policy. • To provide an improved website that gives clear information and guidance on the fees and charges for Events within the District. • The Overview and Scrutiny Panel raised concerns that increases in fees and charges could result in some events not being able to afford these costs and the number of events coming into the district falling. If there are users of TDC services, the policy aims to achieve fairness in the charging. With the introduction of the new fees and charges, it was agreed that the Events Team will monitor the number of events for future years.
<p>Final recommendation for this issue</p>	<p>Introduce new fees and charges stated within the Events Policy to be in place for the new budget year 2017/2018. The Overview and Scrutiny Panel agreed the proposal for the new fees and charges to be presented to Cabinet.</p>
<p>Aims of the Duty furthered by this recommendation</p>	<p>The Events Policy aims to meet the duty to:</p> <ul style="list-style-type: none"> • Advance equality of opportunity between people who share a protected characteristic and those who do not. • Foster good relations between people who share a protected characteristic and those who do not.

Events can do this by:

- **Eliminate Unlawful discrimination – harassment, victimisation & any other conduct prohibited by the Act.**

The Events Policy furthers this aim of the duty by ensuring the opportunity for inclusiveness for all stakeholders.

- **Advance Equality of Opportunity by:**

Removing or minimising disadvantages suffered by people due to their protected characteristics

Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.

Encouraging people with protected characteristics to participate in public life or in other activities where their participation is low.