# POLICY NOTE

# THE DOG FOULING (FIXED PENALTY) (SCOTLAND) ORDER 2016

## SSI 2016/xxx

The above instrument was made in exercise of the powers conferred by Section 9(2) of the Dog Fouling (Scotland) Act 2003. The instrument was subject to affirmative procedure.

## Policy Objectives

The policy objective of this instrument was to increase the fixed penalty for dog fouling from its current level of £40 to £80. The increased penalty applies to all fixed penalty notices issued for dog fouling with effect from 1 April 2016. The fixed penalty has been increased to £80 to bring it into line with the fixed penalty for littering which was uprated to £80 with effect from 1 April 2014.

## Consultation

To comply with the requirements of Section 15(3)(b) of the Dog Fouling (Scotland) Act 2003, the Scottish Government carried out a public consultation on promoting responsible dog ownership. The consultation ran from 27 December 2013 to 31 March 2014 and included questions on tackling dog fouling. The majority of respondents (67%) agreed that more could be done to address this issue.

Respondents made a wide range of suggestions about how to more effectively address the problem of dog fouling. The four mentioned most often were to:

- undertake better enforcement
- increase the level of fixed penalties
- improve education and public awareness
- provide more dog bins, and empty them more frequently

Increasing the level of fixed penalties was the one action which the Scottish Government could take directly so we carried out a further consultation with key stakeholders on our proposal to align the dog fouling fixed penalty with that for littering. The majority of stakeholders consulted agreed with the proposal.

The respondents to this consultation included:
*All Scottish Local Authorities*
*Police Scotland*
*Keep Scotland Beautiful*
*Convention of Scottish Local Authorities*
*Scottish Community Safety Network*
*Scottish Community Wardens Network*
*Kennel Club Scotland*

**Impact Assessments**

An equality impact assessment has been completed on the SSI and is attached. There are no equality impact issues.

**Financial Effects**

The Minister for Community Safety and Legal Affairs confirms that no Business and Regulatory Impact Assessment is necessary as the instrument has no financial effects on the
Scottish Government, local government or on business.

**Scottish Government**
**Directorate for Safer Communities**

**December 2015**

**EQUALITY IMPACT ASSESSMENT RECORD**

| | | |
|---|---|---|
| **Title of policy/ practice/ strategy/ legislation etc.** | **Dog Fouling (Scotland) Act 2003 - Increase in Fixed Penalty Order 2016** | |
| **Minister** | **Minister for Community Safety and Legal Affairs** | |
| **Lead official** | **Douglas Forrester** | |
| **Officials involved in the EQIA** | **name** | **team** |
| | **Douglas Forrester** | **Safer Communities Division** |
| **Directorate: Division: Team** | **Directorate for Safer Communities** | |
| **Is this new policy or revision to an existing policy?** | **Revision to an existing policy** | |

## Screening

### *Policy Aim*

This policy impacts upon the National Outcome "we have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others".

Dog Fouling is a major source of irritation within many of Scotland's communities, in the last household survey 31% of respondents told us "animal nuisance" (animal noise or the presence of dog fouling) was very common or fairly common in their neighbourhood.

By increasing the penalty from £40 to £80, we aim to set it at a level which we hope will serve as a deterrent to ensure dog owners clear up after their pets but also a level so as not to make payment prohibitive. It also will bring the dog fouling penalty into line with littering, which was an issue of concern raised by our local authority counterparts.

***Who will it affect?***

The primary objective of this policy is to reduce the incidences of dog fouling across Scotland by increasing the fixed penalty, therefore this would not impact adversely upon anybody. In fact it would have a positive impact on children, who are more at risk of the disease 'toxicariasis' which can be caused by humans coming into contact with infected animal faeces. The aim of the increased fixed penalty is simply to influence the behaviours of **all** dog owners.

***What might prevent the desired outcomes being achieved?***

It is more likely than not the spending review could force local authorities to realign their priorities in light of any new financial settlement. This could result in budget reductions which may risk impacting upon the number of community wardens who are responsible for monitoring dog fouling activity.

The increased fixed penalty would still be accrued to the local authorities, therefore allowing them to invest the proceeds in measures to combat dog fouling including extra wardens or bins.

There is also the question about collection rates for increased fines where more people say they would be unable to pay. However, some local authorities have measures in place for dog owners unable to pay the fine, such as Glasgow City Council, who allow fixed penalty recipients to participate in community clean-ups instead of paying the fixed penalty.

We have written to all local authorities about best practice in tackling dog fouling and examples such as Glasgow's will be used when we share out examples of best practice among all local authorities. That will allow them to consider alternatives such as this for people unable to pay.

## Stage 1: Framing

### *Results of framing exercise*

We found that reducing dog fouling would not only make our communities cleaner but would also impact positively upon children who are more at risk from potentially playing on contaminated soil. Also, Section 3 of the Dog Fouling (Scotland) Act 2003 has exemptions in placed which include certain categories of disabilities - i.e. blindness and mobility impairment.

### *Extent/Level of EQIA required*

This is a relatively simple legislative change, which increases the fixed penalty for dog fouling to bring it into line with the penalty for littering. If a dog owner 'bags' after their dog (as required by the Act), but later disposes of the bag inappropriately, they can be fined £80 for littering. If they walk away without clearing up at all, the fine is only £40. It has been set as this level since the Act came into force in late 2003.

There is no assessment required. The people most directly affected would be disabled people, however Section 3 of the dog fouling legislation already mitigates for this and exempts people with certain disabilities which would affect their ability to 'pick up' after their dog. Since there will be no revision to this part of the legislation, no further assessment is required.

In the case of fouling by the dogs of disabled owners exempted by the Act, local authorities operate hotlines and members of the public can still report incidences of dog fouling. In those circumstances, all other normal actions will be taken to clear up (except for issuing a fixed penalty to the exempted dog owner).

**Stage 2: Data and evidence gathering, involvement and consultation**

Include here the results of your evidence gathering (including framing exercise), including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

| Characteristic1 | Evidence gathered and Strength/quality of evidence | Source | Data gaps identified and action taken |
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| **AGE** | A reduction in the presence of dog fouling would be particularly beneficial to children. Dog faeces may carry 'toxicariasis', which is a roundworm parasite which can spread from animals to human through contact with infected faeces. The disease is most likely to affect young children.<br><br>This is due to the fact children are more likely to put their hands in their mouths whilst playing in contaminated soil. Although this disease shows no symptoms in many cases, some cases may result in mild but unpleasant symptoms such as stomach pains and rare cases could result in vision loss.<br><br>There could be a potentially negative impact on older people who are more likely to be less mobile, affecting their ability up dog waste from the ground. Also, older people are more likely to be on a fixed income (i.e. the state pension) and are more likely to have less | Toxicariasis: NHS Choices site<br><br>Scottish Household Survey 2014 | If the increased penalty results in the desired outcome of reducing dog fouling, that will reduce incidences of toxicariasis in turn.<br><br>We will work with delivery partners to encourage them to make communications, products and services accessible ahead of this fixed penalty increase coming into effect.<br><br>In cases where people feel they have been treated unfairly, all local authorities have complaints procedures in place where members of the public can complain if they are unhappy about their |

1 Refer to Definitions of Protected Characteristics document for information on the characteristics

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| | financial means to cover the cost an increased fixed penalty.<br><br>There is no evidence available to confirm of any particular age group is more likely to allow their dog to foul without clearing up. However the 2014 Scottish Household Survey (SHS) found people aged under 60 were more likely to see "animal nuisance" as a problem. 32% of respondents aged 16 to 39 and 40 to 59 said "animal nuisance" was very common or fairly common in their neighbourhood. This percentage dropped to 27% for respondents aged over 60. | | treatment by, or the attitude of, a member of staff.<br><br>If any person felt they were unfairly issued with a fixed penalty when they were unable to pick up after their dog for this reason, they have the right to take their complaint through the local authority's formal complaints channels and, if necessary, the Scottish Public Services Ombudsman.<br><br>However, we have never received any correspondence to date about this matter which suggests this is not a problem. |
| **DISABILITY** | The effect on people with disabilities is covered by Section 3 of the 2003 legislation. Fixed penalties are not payable by blind persons in charge of a guide dog being used for their guidance, or people with disabilities which affect their mobility or ability to lift, move or carry everyday objects who are in charge of an assistance dog. | Section 3: Dog Fouling (Scotland) Act 2003 | We will work with local authorities to identify ways to ensure consideration be given when people who are affected by mobility restrictions are affected by this Act. |

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| | These exemptions will continue to apply, since those section of the dog fouling legislation are not being amended - nor will we be amending them at any time in the future.<br><br>As well as older people, there is a potential risk of people with reduced mobility whose dog is not an assistance dog and therefore not exempt under section 3 being affected to a greater extent. | | As mentioned above, in the section concerning age, all local authorities have complaints procedures in place where people feel they have been treated unfairly.<br><br>However, we have never received any correspondence to date about this matter which suggests this is not a problem. |
| **SEX** | The Scottish Household Surveys does not provide an analysis of breakdown by gender, as to how many people have found animal nuisance as being either very common or fairly common in their neighbourhood. | | We do not believe this will impact upon gender, therefore no further investigation is necessary. |
| **PREGNANCY AND MATERNITY** | We are aware that pregnancy may impact upon a person's mobility if required to lift objects from the ground. However, we have no evidence to suggest this has ever been an issue as local authorities are bound by the provisions of the Section 149 of the Equality Act 2010.<br><br>This means a public authority must, in the exercise of its functions, have due regard to the need to eliminate discrimination, | | As mentioned above, in the section concerning age, all local authorities have complaints procedures in place where people feel they have been treated unfairly.<br><br>However, we have never received any correspondence to date about this matter which |

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| | harassment, victimisation and any other conduct prohibited by the Equality Act 2010. | | suggests this is not a problem. |
| **GENDER REASSIGNMENT** | We did not find any evidence relating to gender reassignment and dog fouling. | | We do not believe this policy will impact upon gender reassignment, therefore further investigation is not necessary. |
| **SEXUAL ORIENTATION** | We did not find any evidence relating to sexual orientation and dog fouling. | | We do not believe this policy will impact upon sexual orientation, therefore further investigation is not necessary. |
| **RACE** | We did not find any evidence relating to race and dog fouling.<br><br>It may be that dog ownership will be less common among some African or Asian communities due to certain beliefs about dogs among some followers of Islam. This is covered in the section about religion or belief below. | | We do not believe this policy will impact upon race, therefore further investigation is not necessary. |
| **RELIGION OR BELIEF** | We did not find any evidence relating directly to religion and belief and dog fouling.<br><br>It is worth noting that Islam can regard the saliva of dogs as “ritually impure” and any believer coming into contact with it must wash seven times. | About religion - dogs in Islam | We do not believe this policy will impact upon religion or belief, therefore further investigation is not necessary. |

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| | However the Maliki school of thought says that washing is not because dogs are unclean, but simply as a means of preventing the spread of disease.<br><br>This suggests dog ownership is possibly less likely among Islamic households than other religions, however there is no evidence to suggest any widespread hostility towards dogs is prevalent among Muslims. | | |
| **MARRIAGE AND CIVIL PARTNERSHIP** (the Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices - refer to Definitions of Protected Characteristics document for details) | We did not find any evidence relating to marriage and civil partnership and dog fouling. | | We do not believe this policy will impact upon people's relationship status, therefore further investigation is not necessary. |

**Stage 3: Assessing the impacts and identifying opportunities to promote equality**

Having considered the data and evidence you have gathered, this section requires you to consider the potential impacts – negative and positive – that your policy might have on each of the protected characteristics. It is important to remember the duty is also a positive one – that we must explore whether the policy offers the opportunity to promote equality and/or foster good relations.

**Do you think that the policy impacts on people because of their age?**

| Age | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination, harassment and victimisation | | | X | Improved communications with stakeholders should help overcome any existing communication barriers, between different age groups.<br><br>Local authorities are required to have complaints processes in place where members of the public can complain if they feel they have been treated unfairly by council staff. We have never been contacted by members of the public concerned about being treated unfairly by council staff in relation to dog fouling penalties to date.<br><br>However, with the penalty increasing, we will work with local authorities to establish whether they are receiving more complaints about unfair treatment (in relation to dog fouling penalties) after the increase. This would include establishing whether any complaints of this nature had been received, and whether the complaint was upheld. |

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| Advancing equality of opportunity | | | X | The aim of increasing the dog fouling fixed penalty is to help change behaviours among dog owners to help ensure they are more likely to clean up. |
| Promoting good relations among and between different age groups | X | | | It is hoped improved communications will raise awareness among all age groups how younger people, particularly children, are more likely to suffer a worse reaction from the toxicariasis disease and the effects of it. This in turn aims to encourage dog owners to pick up and eliminate that risk entirely. |

**Do you think that the policy impacts disabled people?**

| Disability | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination, harassment and victimisation | | | X | In addition to those people with disabilities already exempted by the Act, we will work with stakeholders to raise awareness about the revised fixed penalty to ensure all people with disabilities not exempted by the Act are fully aware of the increase. We will also encourage our stakeholders to use a common sense approach when it comes to dealing with such cases.<br><br>As with the process for monitoring age related discrimination, we will also work with local authorities to ensure there is no indirect discrimination towards disabled people by checking with local authorities about complaints received, |

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| | | | | and whether they were upheld. This will apply to people with both physical and learning disabilities, not already exempted by the Dog Fouling (Scotland) Act 2003. |
| Advancing equality of opportunity | | | X | The aim of revising the fixed penalty is to help promote behavioural change among dog owners to clean up after their pets. |
| Promoting good relations among and between disabled and non-disabled people | | | X | Support from local authorities when exercising their functions under the provisions of the Dog Fouling (Scotland) Act 2003 should be applied equally to all members of the community. We will work on an ongoing basis with stakeholders to promote this. |

**Do you think that the policy impacts on men and women in different ways?**

| Sex | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender. Our aim is to influence the behaviours of all dog owners. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender. Our aim is to influence the behaviours of all dog owners. |
| Promoting good relations between men and women | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender. Our aim is to influence the behaviours of all dog owners. |

**Do you think that the policy impacts on women because of pregnancy and maternity?**

| Pregnancy and Maternity | Positive | Negative | None | Reasons for your decision |
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| Eliminating unlawful discrimination | | | X | This policy has no impact upon pregnancy and maternity. However, we would expect a 'common sense' approach insofar as pregnancy may also affect people's mobility, especially if required to pick up objects. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to pregnancy or maternity. Our aim is to influence the behaviours of all dog owners. |
| Promoting good relations | | | X | We do not consider the revised fixed penalty to be an issue in relation to pregnancy or maternity. Our aim is to influence the behaviours of all dog owners. |

**Do you think your policy impacts on transsexual people?**

| Gender reassignment | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender reassignment. Our aim is to influence the behaviours of all dog owners. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender reassignment. Our aim is to influence the behaviours of all dog |

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| | | | | owners. |
| Promoting good relations | | | X | We do not consider the revised fixed penalty to be an issue in relation to gender reassignment. Our aim is to influence the behaviours of all dog owners. |

**Do you think that the policy impacts on people because of their sexual orientation?**

| Sexual orientation | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to sexual orientation. Our aim is to influence the behaviours of all dog owners. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to sexual orientation. Our aim is to influence the behaviours of all dog owners. |
| Promoting good relations | | | X | We do not consider the revised fixed penalty to be an issue in relation to sexual orientation. Our aim is to influence the behaviours of all dog owners. |

**Do you think the policy impacts on people on the grounds of their race?**

| Race | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to race. Our aim is to influence the behaviours of all dog owners. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to race. Our aim is to influence the behaviours of all dog owners. |
| Promoting good race | | | X | We do not consider the revised fixed penalty to be |

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| relations | | | | an issue in relation to race. Our aim is to influence the behaviours of all dog owners. |

**Do you think the policy impacts on people because of their religion or belief?**

| Religion or belief | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to religion or belief. Our aim is to influence the behaviours of all dog owners. |
| Advancing equality of opportunity | | | X | We do not consider the revised fixed penalty to be an issue in relation to religion or belief. Our aim is to influence the behaviours of all dog owners. |
| Promoting good relations | X | | | There is an indication that some followers of Islam may regard dogs as “ritually impure” due to certain teachings. However, there is no evidence to suggest widespread hostility to dogs is prevalent among Muslims. |

**Do you think the policy impacts on people because of their marriage or civil partnership?**

| Marriage and Civil Partnership[2] | Positive | Negative | None | Reasons for your decision |
|---|---|---|---|---|
| Eliminating unlawful discrimination | | | X | We do not consider the revised fixed penalty to be an issue in relation to anybody's relationship status. Our aim is to influence the behaviours of all dog owners. |

2 In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, education etc. do not apply to that protected characteristic. Equality impact assessment within the Scottish Government does not require assessment against the protected characteristic of Marriage and Civil Partnership unless the policy or practice relates to work, for example HR policies and practices.

## Stage 4: Decision making and monitoring

### *Identifying and establishing any required mitigating action*

If, following the impact analysis, you think you have identified any unlawful discrimination – direct or indirect - you must consider and set out what action will be undertaken to mitigate the negative impact. You will need to consult your legal team in SGLD at this point if you have not already done so.

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| Have positive or negative impacts been identified for any of the equality groups? | Positive impacts (if the policy reduces incidences of dog fouling, as intended) would include a reduction in toxicarisasis cases among children and a positive view from those members of the Muslim community who may be averse to dogs as a result of religious teachings. |
| Is the policy directly or indirectly discriminatory under the Equality Act 2010[3]? | There is no evidence of discrimination from this policy. However we will work with local authorities to ensure consideration is given to the small minority of cases where mobility may be an issue - for example due to pregnancy, age or disabilities not exempted by the Act (whether physical or learning disabilities).<br><br>As outlined above, local authorities have complaints procedures in place for people who feel they have been treated unfairly. Therefore if anybody feels they have been unfairly issued with a dog fouling fixed penalty they may complain to the local authority and, if necessary, the Scottish Public Services Ombudsman.<br><br>Following the increase in the fixed penalty, we will liaise with local authorities to check whether they have received any |

**3** See EQIA – Setting the Scene for further information on the legislation.

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| | complaints about people who feel they have been unfairly issued with a fixed penalty and whether that complaint was upheld or not. |
| If the policy is indirectly discriminatory, how is it justified under the relevant legislation? | Not applicable |
| If not justified, what mitigating action will be undertaken? | Not applicable |

### *Describing how Equality Impact analysis has shaped the policy making process*

In this section, set out a narrative that describes how the equality impact analysis has shaped and informed your policy development. Include, for example:

- Explaining whether any changes have been made to the policy as a result of the impact analysis and clearly identifying those changes. Or, explaining why no changes have had to be made.
- Describing any new steps that have been / will be taken as a result of the data and evidence gathered through the EQIA process, for example: adding a new piece of work to ensure that the policy implementation includes ethnic minorities, or working with delivery partners to ensure they fully understand the equality impacts.
- Explaining if there have been, or will be, any implications on costs, resources etc. arising from the EQIA analysis, e.g. has the budget changed because of the EQIA?
- You should also include a paragraph on how the EQIA has helped you develop better outcomes for people and communities**4**.

**4** The EHRC consider that a critical purpose of the EQIA is to achieve better outcomes for people and communities.

- No changes were made from the original policy proposal, to increase the fixed penalty provided by the Dog Fouling (Scotland) Act 2003 from £40 to £80. The impact on people with certain disabilities (namely blind people and people with impaired mobility) is already mitigated for by Section 3 of the dog fouling act.

- There is no budgetary impact as a result of this policy. Section 9 of the dog fouling legislation provides that any fixed penalty issued by a local authority shall be payable to that authority. The 2003 dog fouling legislation provides that monies from fixed penalties are accrued by the local authority issuing them, allowing them to invest in increased measures to tackle dog fouling such as extra wardens or bins.

- We do not know as yet what impact the increase will have on collection rates. We checked with zero waste colleagues to see if information was available on collection rates for littering penalties however they advised us this information is not held centrally.

- The aim of this EQIA, and our decision to proceed with our proposal to increase the dog fouling fixed penalty, is to reduce the frequency of dog fouling within Scotland's communities. Animal nuisance, which includes dog fouling, was noted as very common or fairly common in their neighbourhoods by 31% of respondents to the Scottish Household Survey. This was the most common complaint of all (ahead of littering, where 27% noted it was very common or fairly common)

By raising the fixed penalty for dog fouling, we aim to see this increase serve as a deterrent to dog owners not clearing up after their pets and ultimately promote positive behavioural attitudes where dog owners do take responsibility for their dogs.

### *Monitoring and Review*

In this section, explain how you will monitor and evaluate this policy to measure progress on equality issues identified in the EQIA. Include information on when the monitoring and evaluation will take place, and who is responsible for undertaking it. This should be part of the regular monitoring and evaluation mechanisms you devise for your policy.

We will work closely with delivery partners to establish an effective approach to the strategy's monitoring and measurement. This will primarily focus upon the monitoring of whether complaints have been received by local authorities about issuing fixed penalties unfairly - especially to people with disabilities, or who are less mobile due to age or pregnancy. We will carry out a review of this one year after implementation and consider whether any further measures will be necessary to protect equality interests.

**Stage 5 - Authorisation of EQIA**

Please confirm that:

- This Equality Impact Assessment has informed the development of this policy:

  Yes ☒ No ☐

- Opportunities to promote equality in respect of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation have been considered, i.e.:

  - Eliminating unlawful discrimination, harassment, victimisation;
  - Removing or minimising any barriers and/or disadvantages;
  - Taking steps which assist with promoting equality and meeting people's different needs;
  - Encouraging participation (e.g. in public life)
  - Fostering good relations, tackling prejudice and promoting understanding.

  Yes ☒ No ☐

- If the Marriage and Civil Partnership protected characteristic applies to this policy, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment and victimisation in respect of this protected characteristic:

  Yes ☐ No ☐ Not applicable ☒

**Declaration**

**I am satisfied with the equality impact assessment that has been undertaken for Dog Fouling (Scotland) Act 2003 – Increase in Fixed Penalty Order 2016 and give my authorisation for the results of this assessment to be published on the Scottish Government's website.**

**Name: Gillian Russell**
**Position: Director for Safer Communities**
**Authorisation date: 7 December 2015**