




Equality Analysis



Brent Council Equality Analysis Form

Please contact the Corporate Diversity team before completing this form. The form is to be used for both predictive Equality Analysis and any reviews of existing policies and practices that may be carried out.

Once you have completed this form, please forward to the Corporate Diversity Team for auditing. Make sure you allow sufficient time for this.

<p>Directorate: Strategy, Partnerships and Improvement</p> <p>Service Area: Corporate Policy Team</p>	<p>Person Responsible: Name: Joanna McCormick Title: Partnerships Coordinator Contact No: 0208 937 1608 Signed:</p>
<p>Name of policy: Advice and Guidance Stream Review – Voluntary Sector Initiative Fund</p>	<p>Date analysis started: April 2012</p> <p>Completion date: March 2013</p> <p>Review date: March 2014</p>
<p>Is the policy: New <input checked="" type="checkbox"/> Old <input type="checkbox"/></p>	<p>Auditing Details: Name: Eoin Quiry Title: Senior Practitioner (Diversity) Date 18.04.13 Contact No: 0208 937 1623 Signed: </p>
<p>Signing Off Manager: responsible for review and monitoring Name: Cathy Tyson Title: Assistant Director, Policy Date: April 2013 Contact No: 0208 937 1045 Signed:</p>	<p>Decision Maker: Name individual /group/meeting/ committee: Executive Date: July 2013</p>

2. Brief description of the policy. Describe the aim and purpose of the policy, what needs or duties is it designed to meet? How does it differ from any existing policy or practice in this area? Please refer to stage 2 of the guidance.

In January 2012, the Executive decided to create a Voluntary Sector Initiative Fund from the former Main Programme Grant and Advice budgets. The review and equality analysis undertaken at that time led to the creation of an Advice and Guidance stream within the Voluntary Sector Initiative Fund.

It was identified that the stream would include significant elements which would benefit people with a disability and some elderly people.

During 2012/2013 the Service Level Agreements and grant funded projects within the Advice and Guidance Stream were reviewed to identify better proposals for future advice and guidance provision. These services include generalist and specialist provision for older people and people with disabilities, as well as legal services provision for all residents.

The review has been completed and the following is proposed:

- To renegotiate Service Level Agreements with Brent Community Law Centre for the provision of specialist legal advice and Brent Citizen's Advice Bureau provision of generalist legal advice until March 2015.
- To extend the existing grant agreements with Age UK and Brent Mencap for the provision of advice and guidance for disabled and some elderly people until end of March 2014
- To secure an interim service to replace the grant funded project to provide an umbrella body to represent disabled people in the borough and offer advice and guidance until the end of March 2014.
- Seek new bids for a consolidated advice and guidance for disabled and some elderly people for 2014/2015, incorporating all of funding for advice and guidance for people with disabilities and older people. Include the option to extend for a second year subject to 2014 advice funding decisions.
- To extend existing arrangements for private sector tenant engagement provided by Brent Private Tenants Rights Group until 31st March 2014, giving notice that the council does not intend to fund this particular project after that time.
- To reallocate the funding spent on tenant engagement to commission a project/s to address private sector housing issues in the borough

3. Describe how the policy will impact on all of the protected groups. What evidence have you relied on to reach these conclusions?

Projects currently funded through voluntary sector grants impact on protected characteristics in the following way:

Age – There is a relatively small proportion of people benefiting from projects in the Voluntary Sector Initiative Fund who are aged over 60.

In contrast, approximately 34% of the total funding in the Advice and Guidance funding stream is going to projects where the beneficiaries are aged over 60.

Of the total number of beneficiaries in the Advice and Guidance funding stream, 19.5% are aged over 60.

This is in context with the Borough average where 14.5% of the population is aged over 60.

Disability –Of the total beneficiaries of the Voluntary Sector initiative Funding, 19% are disabled people.

In contrast, 46% of the total funding amount in the Advice and Guidance funding stream is going to projects where the beneficiaries are disabled people.

Of the total number of beneficiaries in the Advice and Guidance funding stream, 26.5% are disabled.

This is in context with the Borough average where 15.6% of the population is registered as disabled.

Some organisations have a higher than average proportion of disabled people benefiting from the project they are running, such as Brent Mencap.

Race – 71% of the funding in the Advice and Guidance stream is benefiting people from a Black or Ethnic Minority (BME) background, which is above the proportion of people from BME backgrounds in the borough population (59%).

Gender – 48% of funding is benefiting females, a slightly lower proportion than that in the borough population (49.8%).

No data is presently held for religion or belief, sexual orientation, gender reassignment, pregnancy or maternity for nearly all organisations presently funded. Organisations presently providing advice report anecdotally that there are only a few cases now and again which are concerned particularly with religion, sexual orientation or gender reassignment. Again anecdotally, there have been a series of cases of employment advice being sought following staff losing jobs after taking maternity leave and this issue has been pursued by the local organisations with further advice for local employers on the legal position. The organisations are tracking cases of this sort so there is an understanding of numbers who benefit from the service on the basis of this protected characteristic.

The policy will have a positive impact on protected groups.

In securing provision for both specialist and non-specialist the Advice and Guidance Stream support in the 4 areas listed above, the policy ensures that there is:

- (i) Widespread positive impact on all protected groups; particularly in terms of legal services provision.
- (ii) Targeted positive impact on specific protected groups (such as the elderly and disabled).

The overall Voluntary Sector Initiative Fund including the Advice and Guidance Stream enables the inclusion of all protected groups and also supports vulnerable groups which would be underrepresented otherwise.

Please give details of the evidence you have used:

The equality monitoring by organizations funded to deliver against Service level agreements and grant agreements was used to assess impact. Snapshots of the population as a whole was used as a benchmark along side evidence of local need identified through Brent Data Statistics responses from residents and local providers of services who were involved in the peer review or subsequent review of existing provision and changed welfare context.

- Consultation responses on the development of Voluntary Sector Initiative Fund including the Advice and Guidance Stream
- Census data (ONS, NOMIS)
- Service Provider self-assessment data (service user statistics)
- Brent borough profile for demographic data (needs assessment)
- Equality monitoring data and guidelines
- Previous reports produced relating to the same user group

4. Describe how the policy will impact on the Council's duty to have due regard to the need to:

(a) Eliminate discrimination (including indirect discrimination), harassment and victimisation;

- The funding of advice and guidance as proposed will ensure that groups subject to discrimination can seek support either through legal advice or through advice tailored specifically to their protected characteristic – disability or age.

(b) Advance equality of opportunity;

- Provide practical support to protected groups (e.g. debt management).
- Provide additional advice and guidance to protected groups.
- Enable service users to improve their access to mainstream services.

(c) Foster good relations

- Multi-agency support and training
- Facilitate service user communications and awareness of support available.
- Updated outcomes and improved referral routes to these services will enable better engagement between those individuals advised and the wider community.

5. What engagement activity did you carry out as part of your assessment? Who did you engage with? What methods did you use? What did you find out? How have you used the information gathered? How has it affected your policy? Please refer to stage 3 of the guidance.

The assessment began drawing on consultation responses to the creation of the Advice and Guidance Stream within the Voluntary Sector Initiative Fund, and customer feedback on legal advice services.

The assessment was developed further on the basis of quantitative data about the demography of the borough in conjunction with equality monitoring data provided by the organisations running presently funded projects. Each group provided equality information about the people who benefit from projects they run and this has been used to make a qualitative judgement.

These projects were agreed upon before the Equality Act 2010 came in and the monitoring covered race, gender, disability and age but not pregnancy, maternity and gender reassignment. Only some organisations provided information on religion and sexual orientation and the data was not comprehensive enough to analyse. Each project was considered separately in relation to each equality strand and then the collective themes and strands were also analysed.

6. Have you identified a negative impact on any protected group, or identified any unmet needs/requirements that affect specific protected groups? If so, explain what actions you have undertaken, including consideration of any alternative proposals, to lessen or negate this impact. Please refer to stage 2, 3 & 4 of the guidance.

Most of the recommendations facilitate positive impacts for groups of people with protected characteristics. We only identified potential negative impacts for protected groups in relation to one recommendation, which is set out below. In terms of the protected characteristics the following was identified

Age – The fund is now more consolidated and the proposal for aligned advice services will ensure a focus on elderly people, particularly those with a disability. When looking at the Voluntary Sector Initiative Fund as a whole, it is clear that any potential adverse impact for elderly people identified in the 2012 equality analysis for the fund as a whole is mitigated by the implementation of the recommendations for this stream alongside the shift in the people benefiting from the Voluntary Sector Initiative themed grant projects, which in more recent rounds have included more elderly people as beneficiaries.

Disability – Funding has become more consolidated and the proposed alignment of services ensures that the potential adverse impact identified in the 2012 equality analysis is mitigated. The 2012 analysis was one of the key factors in the creation of the Advice and Guidance stream. The equality analysis highlights that people with a disability will be positively impacted by the continued provision through the Advice and Guidance Stream and that across the Voluntary Sector Initiative Fund as a whole, the Advice and Guidance stream balances out the slight under representation of disabled people in other grant funded projects.

Race - Grant funding has consistently benefitted a range of BME communities. The fund as a whole and the advice and guidance stream has a positive impact on people from BME backgrounds with a slightly higher percentage than that seen in the general population accessing the services presently funded. When reviewing the areas of the borough receiving this advice, there is a correlation with deprivation levels and associated poverty which explains this finding.

Gender - There is a slighter lower proportion (48%) of females when compared to the Borough average of 50% who are accessing advice and guidance services in the borough.

No data is presently held for religion or belief, sexual orientation, gender reassignment, pregnancy or maternity for nearly all organisations presently funded. The Corporate Diversity team has begun work with organisations to try to improve monitoring for all of the funded projects within the Voluntary Sector Initiative Fund.

Tenant engagement proposal

The review also considered a lapsed SLA with Brent Private Tenants Rights Group (BPTRG) costing £33,228.98 a year. This had previously led private sector tenant engagement and it is not advice and guidance which is funded. The proposal to cease funding the tenant engagement project at the end of March 2014 has the following potential impact:

There are over 33,000 (Census 2011) households within the borough who are renting private accommodation. Of these, the estimated figures provided by the organisation for numbers of people engaged through the tenant engagement project make up approximately 1.5% with a large proportion being older people.

The potential impact will be mitigated through the Private Sector Housing Forum and area specific 'Brent Connects' Forums across the borough where residents can raise issues of concern. Also, private sector tenants will be able to access other generalist advice services in the borough.

Alternative support for concerns identified by private sector tenants is also available for residents in private sector housing through housing teams, the tenancy relations service (currently going through a procurement process) and a healthy homes project led by Brent Private Tenants Rights Group under the themed grant funding stream of the Voluntary Sector Initiative Fund. Private sector tenants are engaged through case work support rather than the broader engagement of private sector tenants on cross cutting issues.

The recommendations propose commissioning work to address private sector housing issues, many of which are the key concerns of those engaged through the tenant engagement project. This also offers a form of mitigation.

Brent Association of Disabled People

As the council is not in a position to continue to fund BADP, there is a potential impact on people with a disability in the first instance. The report proposes putting in an alternative service in place as an interim measure and then to look at a consolidated service of advice and guidance for disabled and elderly from April 2014.

Please give details of the evidence you have used:

Please see data listed in section 3 and evidence of engagement listed in section 5.

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

Protected Group	Positive impact	Adverse impact	Neutral
Age	√		
Disability	√		
Gender re-assignment			√
Marriage and civil partnership			√
Pregnancy and maternity			√
Race	√		
Religion or belief			√
Sex	√		
Sexual orientation			√

8. The Findings of your Analysis

Please complete whichever of the following sections is appropriate (one only). Please refer to stage 4 of the guidance.

Adjust the policy

This may involve making changes to the policy to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential adverse effect on a particular protected group(s).

Remember that it is lawful under the Equality Act to treat people differently in some circumstances, where there is a need for it. It is both lawful and a requirement of the public sector equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

If you have identified mitigating measures that would remove a negative impact, please detail those measures below.

Please document below the reasons for your conclusion, the information that you used to make this decision and how you plan to adjust the policy.

To mitigate the potential impact of the Brent Association of Disabled People no longer being in a position to deliver the project, the report proposes that the council secures an interim service until the end of March 2014 and in the meantime seeks consolidated advice and support services for people with disabilities and older people to begin in April 2014.

To mitigate for any impact of ceasing to fund the Tenant Engagement Project after March 2014, in addition to the existing provision of generalist advice through organisations like Citizens Advice Bureau and the housing team at Brent Council, there will be numerous opportunities for private tenants to raise issues of concerns through housing forums such as the Private Sector Housing Forum and the ward specific Brent Connects Forums. A further commissioned project looking at private sector housing issues will seek to respond to some of the key points identified by private sector tenants through tenant engagement.

The proposals outlined above adjust the policy to respond to changes in need and organisational circumstance.

9. Monitoring and review

Please provide details of how you intend to monitor the policy in the future. Please refer to stage 7 of the guidance.

The voluntary sector is engaged and consulted with through the voluntary sector liaison forum. In addition, the development of a new CVS offers the ideal opportunity to communicate across the range of organisations which make up Brent’s voluntary sector.

Future monitoring will take place in the following way:

- Corporate Officer Group to monitor progress of Council-funded projects.
- Updated bidding documentation.
- Updated monitoring forms for project returns which cover all protected characteristics in the Equality Act and emphasize the action being taken to tackle any adverse impact identified.
- Quality monitoring of contracts
- Specific equalities measures

10. Action plan and outcomes

At Brent, we want to make sure that our equality monitoring and analysis results in positive outcomes for our colleagues and customers.

Use the table below to record any actions we plan to take to address inequality, barriers or opportunities identified in this analysis.

Action	By when	Lead officer	Desired outcome	Date completed	Actual outcome