

# 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.

<b>1. Roles and Responsibilities:</b> please refer to stage 1 of the guidance	
<b>Directorate: Children &amp; Young People</b>  <b>Service Area:</b>	<b>Person Responsible:</b> Name: Sue Gates Title: Head of Early Years & Family Support Contact No: 020 8937 2710 Signed:
<b>Name of policy:</b> Changing some children's centre provision to provide Nursery Education Grant funded childcare and also increasing some out of traditional hours children's centre services.	<b>Date analysis started: 2014</b>  <b>Completion date 23 June 2014</b>  <b>Review date: 3 December 2014 and 6 December 2014</b>
<b>Is the policy:</b>  New <input checked="" type="checkbox"/> Old <input type="checkbox"/>	<b>Auditing Details:</b> Name: Elizabeth Bryan Title: Equality Officer Date: 26 June 2014 Contact No: 0208 937 1190 Signed:
<b>Signing Off Manager:</b> responsible for review and monitoring Name: Sue Gates Title: Head of Early years & family support Date: 23 June 2014 Contact No: 020 8937 2710 Signed:	<b>Decision Maker:</b> Name individual /group/meeting/ committee: <b>Sara Williams</b> <b>Operational Direction – Early Help &amp; Education</b> Date: 23 June 2014

**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.

The proposal is that we will transfer Treetops Children's Centre in Willesden to a childcare provider. Although Treetops is in a more affluent part of Willesden, there are still many parents who would choose this as a nursery for their children to receive their free nursery entitlement. This will increase childcare places (numbers will be confirmed following Ofsted registration) available for Brent families and at least two to three additional staff being employed as childcare workers. To ensure adequate services in the Willesden locality, however, we propose making available additional services through the Willesden health centre and offering evening and weekend provision at the Treetops Children's Centre. The health centre is in a more deprived part of Willesden and it will be easier for some of our targeted vulnerable families to access alongside their healthcare services.

Statistics show that we need an increase of NEG funded child places in the locality. The July 2013 Ofsted report makes clear that Treetops is not well established in the community. This relates mainly to its location in a more affluent part of Brent. By making provision available during the evening and weekend, we hope to increase access to working parents, while simultaneously making more provision available in Willesden where the level of deprivation is more significant. We have in-principle agreement with the childcare provider in relation to this.

At Barham Park Children's Centre in Wembley we propose to lease the Children's Centre to a Nursery Education Grant (NEG) two year and three and four year old provider for use during the day, this will increase the available places in this area. We plan to offer Children's Centre activities outside of traditional service delivery hours for those who cannot access activities during normal opening hours of 9am to 4pm.

We propose to lease the large hall of St. Raphael's Children's Centre in Harlesden to a child care provider for provision of NEG two year and three and four year old places. There is limited good quality provision in this area. This will not impact on Children's Centres services as this hall is an underused integrated space.

### **3. Describe how the policy will impact on all of the protected groups:**

We believe that the impact of the proposals will be neutral on most protected groups except for the 'Age' group and 'Race' group. The 'Age' group will benefit where the impact will be positive on eligible two year olds meeting the DfE criteria who will be able to access targeted childcare provision. In Willesden and Harlesden, the Somali community make up the largest community group (11.5 per cent and 24.8 per cent respectively) and as they also figure in the workless households list, they will be able to access and benefit from the targeted provision offered by the NEG2 entitlement and other children's centre activities. The policy will also benefit working parents who historically have not been able to access many traditional children's centre activities as they have tended to take place between 9am and 4pm on weekdays. Children with a disability will also be able to access places in this provision and this will be a requirement of our engagement of contract.

### **Please give details of the evidence you have used:**

We have used feedback from the annual Parent Satisfaction Survey carried out in children's centres and from Parents Forum discussions. We have also used data on eligible families sent to us by the DfE which when broken down by locality shows a high number of eligible families for the two year free early education entitlement in Wembley, Willesden and Harlesden:

Harlesden	459
Kilburn	243
Kingsbury	225
Wembley	418
Willesden	368

**TOTAL 1,713**

(Taken from the DWP dataset, April 2014)

**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;**

We are not aware of any public concerns of discriminatory practices or policies within these settings. The proposed changes will have a positive impact on most local parties. We anticipate that there is likely to be concern from other local childcare providers who may not be aware of the incoming need in the area. We will understand more the public concerns once consultation has been completed.

**(b) Advance equality of opportunity;**

We aim to ensure, as per Brent Council's Equality and Diversity Policy Statement, that our services continue to meet the varied individual needs of local children and parents and that they continue to have equal access to services, regardless of their race, heritage, gender, religious or non-religious belief, nationality, family background, age, disability or sexuality, in a fair and equitable manner. Our services will remain relevant, responsive and sensitive and alternative arrangements will be made where required in order to ensure that local children and parents have continued access as appropriate. There will be increased service provisions.

**(c) Foster good relations**

Our services will remain relevant, responsive and sensitive and alternative arrangements will be made where required in order to ensure that all local children and parents have continued access as appropriate. Informed and local access to childcare is a positive change.

**5. What engagement activity did you carry out as part of your assessment?**  
Please refer to stage 3 of the guidance.

**i. Who did you engage with?**

Consultation is ongoing. Families, staff members, the Advisory Boards and local providers in the relevant areas have been consulted on the proposals. Consultation is taking place across all the protected characteristics and in a targeted fashion for families living in Willesden, Harlesden and Wembley.

**ii. What methods did you use?**

We have used Parents Forum discussions, other meetings and questionnaires for parents, staff and Advisory boards. These have been made available on-line and in hard copy.

**iii. What did you find out?**

The consultation is ongoing. We are not expecting negative responses but other childcare providers may have concerns. We believe that there is sufficient demand for NEG funded places in both Willesden, Harlesden and Wembley to warrant the setting up of additional provision.

**iv. How have you used the information gathered?**

Informal conversations with some parents have already helped us to shape the questionnaires. The feedback gathered will be used to inform the delivery of the childcare provision which will take into consideration the views and responses of affected families, staff, advisory boards all other childcare providers.

**v. How has it affected your policy?**

N/A yet, but the findings will be used to inform and adapt the policy where needed to ensure that the needs of local families and stakeholders are met.

**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 mitigate against this impact.**

Please refer to stage 2, 3 & 4 of the guidance.

The primary negative impact of this proposal will be for families who are current users of Treetops Children's centre and Barham Park Children's Centre in that they will not be able to continue accessing the activities currently offered there and will instead have to go to other centres in the locality. We have minimised the impact of this by ensuring that the same or similar services are available in the locality:

- Providing high quality childcare in an area of deprivation and need.
- Increasing evening and weekend provision at Treetops and Barham Park Children's Centre and making additional satellite provision available at Willesden Health Centre for families living in the Willesden locality
- Increasing childcare provision for families with young children at Treetops, St Raphael's and Barham Park Children's Centre

With the above actions in place, we believe negative impact can be brought down to a minimum and in most cases mitigated away.

**Please give details of the evidence you have used:**

**7. Analysis summary**

Please tick boxes to summarise the findings of your analysis.

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

## 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.

### No major change

*Your analysis demonstrates that:*

- *The policy is lawful*
- *The evidence shows no potential for direct or indirect discrimination*
- *You have taken all appropriate opportunities to advance equality and foster good relations between groups.*

*Please document below the reasons for your conclusion and the information that you used to make this decision.*

**We will continue with this proposal which will be subject to the completion of the consultation process.**

### 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.*

### **Continue the policy**

*This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not amount to unlawfully discrimination, either direct or indirect discrimination.*

*In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.*

*Explain the countervailing factors that outweigh any adverse effects on equality as set out above:*

We believe the outcomes of the changes will be mostly positive for local children and families.

*Please document below the reasons for your conclusion and the information that you used to make this decision:*

### **Stop and remove the policy**

*If there are adverse effects that are not justified and cannot be mitigated, and if the policy is not justified by countervailing factors, you should consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.*

*Please document below the reasons for your conclusion and the information that you used to make this decision.*

## **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.

Will renew once consultation is complete and then monitor in 3 months and 6 months through parent satisfaction surveys due in 6 months and parents forums that already meet monthly.

### 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

**Please forward to the Corporate Diversity Team for auditing.**