

Cumulative Equalities Assessment – Budget Proposals 2019/20 – 2020/21

1 INTRODUCTION

The purpose of this Equality Impact Assessment is to provide an analysis of the likely impact of the budget savings proposals, with a particular focus on 2019/20, on residents and community groups with 'protected characteristics' as defined by the Equality Act 2010. The nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership¹, race, religion or belief, sex and sexual orientation, pregnancy and maternity. Section 149, Public Sector Equality Duty (PSED) of the Equality Act 2010 requires the Council in the exercise of its functions to have regard to the need to:

1. eliminate discrimination, harassment, and victimisation and any other conduct prohibited under the act;
2. advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
3. foster good relations between persons who share a relevant protected characteristic and those who do not.

Whilst not a statutory requirement, it is our policy that where relevant an equality analysis should also cover human rights and socio-economic equality implications.

The Council is committed to equality, diversity and inclusion. It seeks to ensure that all residents, employees and stakeholders are treated fairly and receive appropriate, accessible services and fair and equal opportunities. This commitment requires that equality considerations play a key role in our decision making processes; and in understanding the effect of our policies and practices.

Approach to Considering Equalities

All the budget savings proposals have been subject to an initial Equality Impact Analysis (EIA) screening which helps to establish the relevance to the Council's equalities duties and whether or not a full EIA is required. Guidance is issued to all officers on how to undertake an EIA and provides that full EIA's will not be required if, through the initial screening, it is clearly demonstrated, for example that there will be no negative equality impacts. However, the council's approach is that EIAs are living documents. Accordingly, even after a screening has been undertaken as projects/proposals develop and further evidence of impacts becomes available, and any unforeseen

¹ Bullet point 2 and 3 does not apply to marriage and civil partnerships.

impacts emerge, they should be reviewed and updated to reflect any changes. In relation to the current budget proposals, after the initial EIA screenings, nine saving proposals were identified as requiring full EIA's the details of which are summarised in this report.

The Council must carefully consider and have regard to the impact of its savings proposals on the PSED; and take a reasonable and proportionate view regarding the overall impact and seek to mitigate negative impacts where possible.

Overall Assessment

- There is no direct discrimination arising out of the budget saving proposals.
- A proportion of the savings:
 - may have a negative impact on equality of opportunity;
 - have the potential to result in indirect discrimination for some people with protected characteristics;
 - may have a negative impact on opportunities to promote good relations.

However, these impacts will be kept under review and where possible mitigations have been identified to reduce the effect as set out below and in the individual savings descriptions.

In light of the above, the proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

2 Key Demographic Data

Key facts about Brent's demographic profile are taken from sources such as the Office for National Statistics, population projections and the 2011 Census. They show how the borough is made up, helps us to identify potential impacts; and identifies the increasing pressures and demand for council services.

- Brent is home to around 334,700 residents and is the 7th largest borough in London.
- The borough has a population density of 7,612 people per square kilometre – the 14th highest population density in the UK, and the highest in Outer London.

- Brent has high levels of population churn: in 2016-17, 32,900 people moved into the borough and 33,700 moved out - a population turnover rate of 202 per 1000 population – 22nd highest out of 391 areas nationally, and 2nd highest across Outer London.
- Brent has a relatively young population: the average age of the population is five years lower than the UK average (35 vs. 40 years).
- Women comprise almost half (49%) of the population but make up 62% of the population aged 85 and over.
- The Brent population increased by 29% between 1997 - 2017. The borough's population change is driven by natural change (more births than deaths) as opposed to net migration.
- Brent has the 6th highest birth rate in England & Wales.
- The population is expected to rise by a further 18% in the next twenty years - which equates to an additional 61,100 residents by 2038 – around 3,000 extra residents per year. This pace of growth is in line with the London average, but almost double the England average (10%).
- The population is ageing: in the next 20 years, the number of residents aged 65 and over is expected to increase by 67% – which will mean an additional 26,700 older residents by 2038. The child population is expected to grow far more slowly, rising by 6% by 2038 (+4,400 children).
- The two wards expected to see the fastest growth are: Tokyngton (+161% rise in population) and Alperton (+103%). Together, these two wards are expected to accommodate an additional 46,400 residents by 2038.

A summary of the key protected characteristics in Brent are as follows:

- Age
 - 22% of Brent population aged under 18.
 - 12% aged 65 and over; including 2% aged 85 and over (fastest growing group).

- Disability
 - Proportion of people registered Disabled, or with a work-limiting disability, is slightly lower in Brent (15%) compared with London (16%).

- Gender reassignment
 - There is no local data on gender re-assignment, though national estimates suggest that around 0.02% of the UK population will undergo gender transition and 1% will experience gender variance.

- Marriage and civil partnership
 - There were 954 marriages that took place in Brent in 2015.
 - 2.4% of marriages in Brent were same-sex, compared with 4.3% across London.

- Race
 - Black, Asian and Minority Ethnic (BAME) ethnicities make up 65% of Brent; the White Other group adds another 16%.
 - 12% of under 18s are White British/Irish; compared with 43% in the 85+ age group.

- Religion or belief
 - Christianity remains the largest religion in Brent; 41% of residents in the 2011 Census.
 - Islam grew 7 percentage points between the 2001 and 2011 Census.

- Sex
 - Slightly more males than females, of working age.
 - More females than males in the older age groups (as women generally live longer).

- Sexual orientation
 - 2.1% of the London population identify as gay or lesbian; equating to around 7,000 in Brent.
 - 0.6% of the London population identify as bisexual; equating to around 2,000 in Brent.

- Pregnancy and Maternity
 - 5,147 live births in Brent in 2016; 72% were to parents who were married or in a civil partnership.
 - The General Fertility Rate is higher in Brent; 72% compared with 64% across London.

3 IMPACT OF SAVING PROPOSALS

A number of the proposed savings generate an income for the Council, or have other positive impacts on residents and communities, for example the Shared Fostering Services and the Reasonable Rents Scheme proposal which are set out in further detail below.

Development of Shared Fostering Service (CYP004)

There is a national shortage of foster carers for children in care. The proposal is to develop a joint fostering service initially with Ealing Borough with the aim of recruiting and retaining a wider selection of in-house foster carers who can provide a stable family environment to looked after children in the respective boroughs. The future aim will be to roll this out to other members of the West London Alliance.

A positive impact is anticipated from this proposal. The joint working and wider recruitment campaigns should enable a wider range of prospective foster carers to be identified from groups falling within the protected characteristics

Reasonable Rents (CWB021)

This proposal is to create a new model to increase the supply of affordable accommodation to help meet the demand for homeless households. The contraction of affordable Temporary Accommodation in the borough is resulting in more homeless households being housed into emergency Bed & Breakfast and/or other forms of temporary accommodation outside of Brent. The Reasonable Rents model will enable Registered Providers (RP) to lease properties (at a more competitive rate) from the private sector and let them to our accepted homeless households. This model will also enable the council to discharge its full housing duty to accepted homeless households. If this proposal is implemented it will not have a retrospective effect and will only apply to newly accepted homeless applications.

The scheme will enable reasonable/more attractive rates to be paid to landlords, allow properties to be retained and the housing portfolio expanded at a reduced cost to the Council.

Some protected groups are over – represented among homeless households. This is partly due to the criteria through which priority need is established, e.g. age, physical disability, mental health and or pregnancy.

Further work will be undertaken to identify the protected characteristics of the households impacted by this proposal. Positive impacts are anticipated from this proposal in relation to a reduction in the loss of properties available and increasing the supply of affordable accommodation to help meet the homeless demand.

Stop Smoking Services (CWB003)

The proposal is to make the service more efficient by stopping the general untargeted smoking cessation services; but maintaining the focussed stop smoking service for mental health service users and pregnant women.

There is a general impact on smokers who would like to quit but do not fall within the focussed groups and would consequentially lose access to free nicotine replacement therapy and face to face support. The revised approach will have a positive effect on the protected characteristics, in particular by advancing equality of opportunity.

The service will focus on more vulnerable users where, for example, the health data supports a greater dependency on smoking, or significant health implications for example on foetal health. Non-eligible service users can access the free online and telephone support provided by the London Smoking Cessation Transformation Project. Stop smoking medication such as Champix/Zyban and Nicotine.

Below is a summary of the full EIA's where a mixture of neutral and negative impacts have been identified. Also attached to this report as Cii are the detailed saving proposal with supporting EIA screenings and Civ which contains the full EIA's where implications on the PSED have been identified

Community Wellbeing

Re-commission of Public Health 0-19 (CWB002)

This proposal is to re-commission and redesign the public health provision for 0-19 service with Children's Centre Services. The rationale being both public health (0-19) and the proposed family hubs service (CYP008) cater for the same families. In streamlining some of the services – efficiencies in service deliver can be released.

The impact may affect (1) all families' with new births and children under 5 because the service location may change and the service delivery may also alter; and (2) schools, for example health promotion activities, as school aged children receive this service provision through the school.

Currently, within the health visiting component of the service an enhanced offer is made to vulnerable families through the Maternal Early Childhood Sustained Home-visiting (MESCH) programme. It is proposed to retain this aspect of the service because it targets the most vulnerable families.

The service re-design and procurement process will be implemented in such a way as to ensure the specifications include measures to minimise the negative impact. For example, having key performance indicators which monitor and specifically address the protected characteristics; and consulting with families, other health, care and education services to shape to the service design. It is also proposed to retain the mandated (statutory) elements of the Universal Healthy Child Programme and The MESCH model which caters to vulnerable families. This EIA should be read in-conjunction with the proposed saving regarding the development of family hubs. The service will also undertake a further EIA as part of the service redesign process.

Children & Young People

Creation of new alternative education provision with wrap around youth services from the Roundwood Youth Centre site. (CYP005)

The proposal is to transform the Roundwood Youth Centre to an alternative educational setting during weekdays with community activities delivered by the voluntary sector in the evenings, weekends and school holidays. Current Local Authority funded youth work programmes will end under this proposal to be replaced by the new model, run in partnership with the voluntary sector and education provider.

The proposal is assessed as more likely to enhance and improve the current offer to young people within the borough than through current service provision – primarily through the greater connectedness of services that will provide a co-ordinated approach to their educational, employment and social needs based around the individual young person.

The potential for any negative impact can be mitigated though effective Local Authority oversight of contract management, clear partnership expectations with the voluntary sector and alternative education provider, alongside robust governance arrangements. The procurement tendering process will ensure that the specification addresses activities for the impacted groups (please see the full EIA for

impacted groups) and the impact of the changes will be mitigated by continued engagement with the identified groups who currently use the centre.

The service will also undertake a further EIA as part of the service redesign process.

Development of Family Hubs (CYP008|)

It is proposed to replace the 17 Children's Centres with 8 family hubs. Children's Centre hubs currently cater for children aged 0-5, whereas the family hubs cater for the entire family aged 0-19 (and 25 with SEND). Services provided by the Children's Centres will still be accessible through the family hub.

The impact will be more significant on vulnerable families that live close to the Children's Centres which are closed. They will not be able to access those support services and may experience longer /additional traveling in order to access the service. This will particularly impact those on low incomes and with disabilities or SEND. There will also be an impact on services provided by the midwifery team around ante-natal and postnatal support and health visiting service, as new mothers/parents will have greater difficulty accessing the support. There could be an increase in isolated young parents and postnatal depression.

Part of the mitigation is to ensure that the family hubs continue to deliver the service which were available at the Children's Centre. Hubs will be targeted in areas that have the highest usage and deprivation levels as well as considering the size and locality of the individual centres. Research based assessments will make the best use of resources and ensure that these are broadened to cover school age children. This will enable a greater reach for targeted services into families. With respect to isolation and additional travelling difficulties, consideration will be given to sourcing assistance with travelling. This EIA should be read in-conjunction with the proposal regarding re-commissioning of public health 0-19. The service will also undertake a further EIA as part of the consultation service redesign process.

Resources

Service Modernisation, More Digital (RES003/004)

There are two parts to this proposal (1) increasing the digital self- service provision by reducing/migrating face to face and telephone enquires (003). This will include utilising Robotic Processing Automation which will improve the current customer offer and address

feedback arising out of the consultation process; and (2) launching a universal offer to all residents which will set an expectation to self-serve using digital channels (004) and a more tailored offer to vulnerable residents to ensure they have access to appropriate assistance.

No direct impact is envisioned by the first proposal as the robotic processing changes the way in which data is processed (thereby improving the service delivered).

In relation to proposal 2, there may be an impact on vulnerable users although the aim of the change is to better target assistance to those who most need it. Consequently, residents who can use self-service will be diverted to self-serve to enable the prioritisation of those service users that require additional support and or assistance. Older people are less likely to be confident in using digital service facilities, people with learning disabilities and those suffering with mental health issues may find it more difficult to use the digital service and require assistance or provision in another way. Users whose first language is not English may also find it more difficult to use digital self-service channels.

Service users who need additional assistance will be identified through a broad framework which will help to determine the type of assistance they need and where this can be accessed. This may include providing access to self service facilities, training and assistance with accessing services through Community hubs or provision of assistance in people's homes. A further EIA may be undertaken in relation to proposal 2 as the new universal offer is developed.

Review of Council Tax Support Scheme (RES011, RES011A, RES011B)

It is proposed to review and implement a revised Council Tax Support Scheme from 2020/21. The exact mechanism and model is still to be determined. With exception of pensioners who are protected by the prescribed national scheme, the proposal could impact on all residents of working age who are currently entitled to council tax support, approximately 18,500 claimants, or some sub-set of them depending on the detailed scheme design. The proposal may have some impact on groups falling within the protected characteristics, for example race, age, disability as they will receive less financial support.

There are a number of possible actions that can be employed to help mitigate any negative impacts. For example, hardship grants and transitional protection. These will be explored in further detail as the scheme design is consulted upon and developed. A further EIA will be undertaken as the proposal is developed; and a subsequent Cabinet decision sought, informed by this, prior to the planned implementation in 2020/21.

Council Tax Increase

It is proposed to increase Council Tax by 4.99% (2% ring fenced for Adult Social Care and 2.99% general increase). This will generate an additional £5.7m of recurring income for the council and avoid further savings having to be made to key council services.

This proposal will impact on all residents in the borough who are liable to pay Council Tax. As the increase has universal application no one particular group with protected characteristics is targeted.

In terms of mitigation, the Council Tax Support Scheme provides some assistance for vulnerable residents and households on low incomes. However, the Council Tax Support Scheme (RES011, RES011A, and RES011B) is subject to a review proposal. Consequently, a further analysis of the cumulative impact will be assessed as part of the modelling of the new scheme.

3 CUMULATIVE IMPACTS

Table 1 below summarises the potential cumulative impacts on groups which have a protected characteristic. No specific impacts have been identified in relation to religion & belief sexual orientation, gender re-assignment and marriage & civil partnership and accordingly these groups have not been included in the table.

The full EIA's have identified a potential for compounded impacts on young people and the elderly (age), those with disabilities, race (BAME and citizen's whose first language is not English) and to a lesser extent those who are pregnant or on maternity leave.

However, at this stage the impacts are considered to be medium to low as a range of mitigating actions have been and will be put in place to reduce the negative impacts and ensure the Council's commitment to making a real difference to the lives of local people is achieved.

A significant number of the proposals support income generation either by way of service design or introducing new initiatives which will have a positive impact on residents, communities and service delivery.

Although initial equality screenings have been undertaken to ascertain the PSED impact, many of the proposals are in their formative stages and are still to be developed and or subject to consultations. Consequently, as the proposals are developed further equality analysis will be undertaken to assess the PSED.

Table 1

Proposal	Age	Disability	Race	Sex	Pregnancy or maternity	Service Area
Recommission Children's Centre (CWB002)	✓ (children)	x	x	x	x	Community Wellbeing
Transform the site and end council run youth services delivered from Roundwood (CYP005)	✓ (young people)	✓	✓	x	x	Children & Young People
Develop family hubs form Children's Centres (CYP008)	✓ (children)	✓	x	x	✓	Children & Young People
Service Modernisation, more digital services (RES003 & RES004)	✓ (elderly)	✓	✓	x	x	Resources
Review of Council Tax Support Scheme (RES011, RES011a, RES011b)	✓	✓	✓	x	x	Resources

4 SOCIO – ECONOMIC IMPLICATIONS

According to the Brent Resident Attitude Survey 2018 (Lower income defined as residents living on household incomes below £20,000 per year, after tax and deductions); certain groups within the population are more likely than others to live in poverty. In Brent, survey analysis shows that those living on lower incomes are more likely to be: those from Black ethnic groups; residents with a disability or long-term illness; older residents; those with no qualifications; those who are not in work; and those who live in social housing.

The proposals regarding children's centres, youth centres and possibly the review of the Council Tax Support Scheme, cumulatively have the potential to negatively impact on families and residents from lower socio-economic groups. Some of the proposals will be mitigated by more effective working with partners to ensure resources are used effectively, retaining statutory parts of the service and the consideration of assistance/transitional protection where feasible. However, these risks which primarily affect women in lower socio – economic groups will need to be carefully monitored and considered by Community Wellbeing and Children & Young People.

5 STAFFING IMPLICATIONS

A number of proposals involve staff restructures or service redesign. In order to minimise the number of compulsory redundancies the council used voluntary redundancy where appropriate. Consequently, many of the budget saving proposals will be met by voluntary redundancies or deleting vacant posts.

Of the staff who were accepted for Voluntary Redundancy, during the Council's voluntary redundancy exercise in 2018/19, the majority were older members of staff, aged 51+ with a higher proportion of females (70%) successfully applying.

The proportion of officers who applied for Voluntary Redundancy in the older age group (79% of applicants) was much higher than the proportion of the overall workforce that this represents (34%).

This is explained by the access to early unreduced pension entitlements in the case of those aged 55 yrs. and over. Whilst this will have an effect on the age profile of the workforce, this impact cannot be avoided whilst maintaining fair access to the Voluntary Redundancy scheme for this age group.

In terms of ethnicity, there was a higher proportion of black staff (35%) who were accepted for voluntary redundancy followed by White (27%) and then Asian (25%) staff.

In all other groups the figures for applications and approvals/rejections do not indicate an adverse impact arising from the application of the scheme criteria.

As further proposals which impact staff are developed further equality analysis will be undertaken.

Council's Equalities Profile

The Council has around 2100 employees. The current equalities profile is set out below. The Council as a whole has a diverse workforce both in terms of age with a roughly equal distribution of age between 31 and 60.

From an equalities perspective, there is a significant proportion of staff who have not identified their disability status (36%), ethnic origin (43%) or religion and belief (39%) and this is like most London Boroughs where equalities data can be improved. The Council has started the “Let Us Know” campaign which encourages officers across the council to update their personal information from an equalities perspective. Nonetheless, the current staffing equalities profile is broadly reflective of the borough’s equalities profile.

Age

By Age Band	Headcount	Percentage of Total
Under 21	20	1%
21-30	335	16%
31-40	539	26%
41-50	552	26%
51-60	525	25%
61-70	130	6%
71-79	5	0%

Disability

By Disability	Headcount	Percentage of Total
Disabled	128	6%
Not Disabled	1218	58%
PNTS / Unknown	760	36%

Gender Re-assignment

Gender identity same as assigned at birth	Headcount	Percentage of Total
Yes	1425	68%
No	13	1%
PNTS / Unknown	668	32%

Marriage & Civil Partnership

Married or in a civil partnership	Headcount	Percentage of Total
Yes	537	25%
No	271	13%
PNTS / Unknown	1298	62%

Race

By ethnic origin	Headcount	Percentage of Total
Asian	340	16%
Black	400	19%
Mixed Heritage	37	2%
White	408	19%
Other	16	1%
PNTS / Unknown	905	43%

Religion or Belief

By Religion	Headcount	Percentage of Total
No religion	186	9%
Christian	644	31%
Hindu	232	11%
Muslim	108	5%
Other	107	5%
PNTS / Unknown	829	39%

Sex

By Gender	Headcount	Percentage of Total
Female	1341	64%
Male	765	36%

Sexual Orientation

By Sexual Orientation	Headcount	Percentage of Total
Lesbian, gay or bisexual	37	2%
Heterosexual/Straight	1251	59%
PNTS / Unknown	818	39%

Pregnancy & Maternity

Currently on Maternity	Headcount	Percentage of Total
No	2077	99%
Yes	29	1%