**Individual Equality Analyses of Budget Proposals** 

#### This document:

- outlines the equality implications of individual budget proposals on equality and socio-economic groups;
- sets out the mitigating factors and monitoring arrangements put in place;
- informs the equalities implications section in the Budget and Council Tax report 2019/20 to 2020/21.

The equality analyses in this report are subject to change in response to alterations to any of the individual budget proposals.

# The table below sets out the equalities analysis for individual proposals:

Service Area	Index	Description	Page no.
CWB	CWB002	Recommission public health 0-19 services with children's centres	4 - 10
CWB	CWB003	Cease untargeted smoking cessation	11 - 16
СҮР	CYP004	Develop a shared fostering service with the 3 other WLA boroughs, resulting in staffing efficiencies	17 - 23
СҮР	CYP005	Create additional local alternative education provision with enhanced activities for young people at the Roundwood Centre site	24 - 34
CYP	CYP008	Develop family hubs from children's centres	35 – 43
RES	RES003/004	Service modernisation- reduced opening hours, more digital services and demand management	45 - 51
RES	RES011	Review of Council tax support scheme - estimated 3, 7% or 15% reduction in total expenditure	52 - 58
CWB	CWB021	Temporary housing to reasonable rents	59 - 66
Council Tax	N/A	Overall Council Tax increase of 4.99%	67 - 73

#### CWB002 Recommission public health 0-19 services with children's centres

#### **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	CWB002
DEPARTMENT:	Community Wellbeing
TEAM:	Public Health
LEAD OFFICER:	Melanie Smith
DATE:	07/01/18

#### **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Recommission public health 0-19 service with children's centres contract to realise efficiencies

A fundamental redesign of the current public health 0-19 service and the Children's Centre services, leading to a joint CYP / PH re-commissioning of a new service which achieves public health and CYP outcomes

Note: should the CYP saving CYP 008 be progressed, it would not be possible to achieve the full saving as the overall contract would be reduced. The two proposals are interdependent and this one would need to be reduced if CYP008 is progressed

This EA should be read in conjunction with that for CYP008

#### 2. Who may be affected by this policy or proposal?

All families with new births and children under 5. The public health 0-19 service is a universal service offered to all children and their families. The mandated universal elements of the service will be retained

School aged children receive a service through schools. Schools will therefore be affected by this proposal

Within the health visiting component of the current service an enhanced offer is currently made to vulnerable families through the MESCH service. These families may or may not have protected characteristics It is proposed to retain this aspect of the service

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. The proposal has the potential to disproportionally impact on people with protected characteristics namely age and pregnancy / maternity

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			Х
Sex		X	
Race		х	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity			Х
Marriage		X	

5. Please complete each row of the checklist with an "X".

SCREENING CHECKLIST				
	YES	NO		
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x			
Does the policy or proposal relate to an area with known inequalities?		х		
Would the policy or proposal change or remove services used by vulnerable groups of people?		<b>x</b> <sup>1</sup>		
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	х			

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

\_

<sup>&</sup>lt;sup>1</sup> As the MESCH service will be retained

#### **SECTION B - IMPACTS ANALYSIS**

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The achievement of savings has the potential to impact negatively on the service offered to pregnant women and children. The proposal will be implemented in such a way as to minimise this through the service redesign and procurement processes. In particular the retention of mandated elements of the universal healthy child programme and the MESCH model should mitigate any negative impact. However a further EA will be required as part of the service redesign.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

	AGE			
Details of impacts identified	The mandated universal elements of the service will be retained. I.e. all families will continue to receive a new birth visit, and the new service will be required to maintain or improve the completion of 6-8 week, one year and two and a half year checks.			
	DISABILITY			
Details of impacts identified	The current public health universal service works with and refers to other health, care and education services to provide for children with a disability. In the redesign of the service, this system working must be explicitly considered			
	RACE			
Details of impacts identified	Not Applicable			
SEX				

Details of impacts identified	Not Applicable		
	SEXUAL ORIENTATION		
Details of impacts identified	Not applicable  The current service is offered to same sex as well as heterosexual couples. No change to this provision is planned		
	PREGANCY AND MATERNITY		
Details of impacts identified	The mandated universal elements of the service will be retained. I.e. all families will continue to receive a new birth visit, and the new service will be required to maintain or improve the offer of antenatal support.		
	RELIGION OR BELIEF		
Details of impacts identified	Not Applicable		
	GENDER REASSIGNMENT		
Details of impacts identified	Not Applicable		
MARRIAGE & CIVIL PARTNERSHIP			
Details of impacts identified	Not Applicable  The current service is offered to all families irrespective of marital status or civil partnership. This will continue		

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, provided the mandated elements of the universal healthy child programme are maintained.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Families were consulted in the development of the current service specification however further engagement in the development of the revised specification will be required

5. Please detail any areas identified as requiring further data or detailed analysis.

The public health service is a universal service which works with and refers to other health, care and education services to meet the needs of those families and children with more complex needs. Further work will be required to understand how the remodelled service will work with the wider system

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The action plan should mitigate negative impacts.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Through robust contract monitoring including the measurement of KPIs which specifically address the equality duty

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The service redesign should retain the mandated elements of the healthy child programme, the MESCH model and be designed in consultation with families and other health, care and education services.

A further EQIA will be required on the new specification.

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".			
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х		
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL			
С	CHANGE / ADJUST THE POLICY/PROPOSAL			
D	STOP OR ABANDON THE POLICY/PROPOSAL			

#### **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Continuous engagement with the community.	Transparency and community being kept up to date with the developments.	Marie McLoughlin and CYP	Before commenceme nt of procurement
Engagement with local health, care and education services	Ensure redesigned service works with the rest of the "system" and avoids families "falling through the gaps"	Marie McLoughlin and CYP	Before commenceme nt of procurement
Specification of new service and KPIs to address equalities duties	A new service model which minimises any negative impacts on both protected characteristics and vulnerable families	Marie McLoughlin and CYP	To be agreed prior to October 2020 and be operational upon Family Hubs launch
Inclusion of mandated elements of healthy	A new service model which minimises any negative	Marie McLoughlin	Before contract award

child programme in new contract and evaluation of bidders against ability to deliver	impacts on both protected characteristics and vulnerable families	,Andy Brown and CYP	
Inclusion of MESCH model in new specification and evaluation of bidders against ability to deliver	A new service model which minimises any negative impacts on both protected characteristics and vulnerable families	Marie McLoughlin ,Andy Brown and CYP	Before contract award
Robust contract management	To ensure performance against specification and KPIs	Andy Brown and CYP	From award of contract and thereafter quarterly

## **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Melanie Smith
HEAD OF	Melanie Smith
SERVICE:	

#### CWB003 Cease untargeted smoking cessation

#### **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	Savings Proposal
DEPARTMENT:	Community and Wellbeing - Public Health
TEAM:	Stop Smoking Service
LEAD OFFICER:	Janice Constance and Clementine Djatmika
DATE:	24/12/2018

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### SECTION A - INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal is to cease untargeted smoking cessation and retain the stop smoking service for mental health service users and pregnant women. Intended results is to make the service more cost-efficient.

2. Who may be affected by this policy or proposal?

In 17/18, 1143 smokers were supported to quit by public health commissioned services. Smokers who wish to quit would lose access to free nicotine replacement therapy and to face to face support.

NRT would still be available to purchase or on prescription. On line and telephone support would be available, provided by the London Smoking Cessation Transformation Project.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The revised service will advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. For example those who are pregnant or those with a disability, i.e. mental health service users. Service outcome is designed to lower inequalities in smoking related outcomes in those with protected characteristics. For example those who are pregnant or those with a disability, i.e. mental health service users.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		Х	
Sex		Х	
Race	Х		
Disability	Х		
Sexual orientation		Х	
Gender reassignment		Х	
Religion or belief		Х	
Pregnancy or maternity	Х		
Marriage		Х	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	Х	
Does the policy or proposal relate to an area with known inequalities?	Х	
Would the policy or proposal change or remove services used by vulnerable groups of people?		Х
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	Х	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### SECTION B - IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

**Disability:** People with disabilities who may also have mental health problems especially those with drug and alcohol problems are more likely to smoke than general population and less likely to quit without support.

**Race:** Some BME groups have higher smoking rates than average (e.g. Bangladeshi, Arab, Turkish and some Eastern Europeans).

Some groups such as the South Asian population will have lower smoking rates, however have an increased rate with the use of other tobacco products such as shisha and chewing tobacco.

**Pregnancy and Maternity:** The impact of smoking during pregnancy on maternal and foetal health is significant in terms of morbidity, mortality, long term infant health and healthcare costs. The smoking status at time of delivery in 2016/17 was 3.2%, this equates to 146 women smoking at time of delivery (fingertips).

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

	AGE		
Details of impacts identified	Not Applicable		
	DISABILITY		
Details of impacts identified	<ul> <li>The stop smoking service will be targeted to mental health service users. This will:</li> <li>Increase available support and resources to aid in smoking cessation</li> <li>Service will be tailored to the needs of this vulnerable group</li> </ul>		

	RACE		
Details of impacts identified	The stop smoking service will be targeted to chewing tobacco/shisha service users. This will:  Increase available support and resources to aid in smoking cessation  Service will be tailored to the needs of this targeted group		
	SEX		
Details of impacts identified	Not Applicable		
	SEXUAL ORIENTATION		
Details of impacts identified	Not Applicable		
	PREGANCY AND MATERNITY		
Details of impacts identified	The stop smoking service will be targeted to pregnant service users. This will:  Increase available support and resources to aid in smoking cessation  Service will be tailored to the needs of this targeted group		
	RELIGION OR BELIEF		
Details of impacts identified	Not Applicable		
	GENDER REASSIGNMENT		
Details of impacts identified	Not Applicable		

MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Not Applicable

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

None identified

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

None identified

5. Please detail any areas identified as requiring further data or detailed analysis.

None identified

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

None identified

- 7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?
- Continuous feedback received from the community,
- Recording demand for service
- Data analysis from Midwifery and mental health services and service users.

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider

what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

As above.			

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".	,
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
С	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

#### **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

#### **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Janice Constance and Clementine Djatmika
HEAD OF SERVICE:	John Licorish

# CYP004 Develop a shared fostering service with other WLA boroughs, resulting in staffing efficiencies

#### **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	CYP004
DEPARTMENT:	Children and Young People
TEAM:	Looked After Children and Permanency Service
LEAD OFFICER:	Onder Beter
DATE:	04/01/2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Development of a joint fostering service with at least one other West London local authority. This would mean joint recruitment, assessment and approval of foster carers as well as support provided to them.

The aim is to recruit and retain more in-house foster carers who could provide a stable family environment to looked after children in those local authority areas. The outcomes are in line with the CYP Departmental Plan and the Borough Plan.

2. Who may be affected by this policy or proposal?

The aim is to attract Brent and other West London local authority residents into fostering. No one is considered to be affected by this change in a negative way. In fact, via joint and more effective recruitment campaigns more prospective foster carers could be reached.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Providing children in care with stable and caring homes and running a fostering service are amongst councils' public sector duties. Hence, making these changes, it is anticipated that the Council's public sector duty will be fulfilled in a more efficient way.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		x	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?		х
Would the policy or proposal change or remove services used by vulnerable groups of people?	х	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	х	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

There is a nationally acknowledged shortage of foster carers for children in care. Brent is not an exception. Whilst local authorities struggle to recruit and retain sufficient number of foster carers, the private and voluntary sector can offer a more flexible and financially attractive package for foster carers. This results in a competitive market. Foster carers recruited by the private and voluntary sector are commissioned by local authorities, especially when they lack in-house foster placements, which is financially burdensome.

In preparation for this project, fostering data for both Brent and one other West London local authority has been reviewed alongside the relevant fostering strategies (marketing and sufficiency strategies).

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE			
Details of impacts identified	It is a challenge to place older looked after children in fostering settings due to lack of sufficiency. A combined approach should enable a newly created agency to reach more potential foster carers who might be able to provide placements for children of all ages.		
	DISABILITY		
Details of impacts identified	Reaching out to more potential foster carers would broaden the profile of carers who could offer placements to children with disabilities.		
	RACE		
Details of impacts identified	Reaching out to more potential foster carers will improve the ability to offer better cultural and ethnic matches between children and their foster carers, including continuing high numbers of unaccompanied asylum seeking children.		

SEX					
Details of impacts identified	Reaching out to more potential foster carers will improve the number of fostering households where the lead carer is male.				
	SEXUAL ORIENTATION				
Details of impacts identified	impacts understand and identify with children's sexual orientation. With				
	PREGANCY AND MATERNITY				
Details of impacts identified	Not Applicable				
	RELIGION OR BELIEF				
Details of impacts Having a broadened profile of foster carers will increase the possibility of better matching of children with carers who sh their families religion or belief systems.					
	GENDER REASSIGNMENT				
Details of impacts identified	Reaching out to more potential foster carers will improve the ability to offer placements for children with carers who understand and identify with gender reassignment issues.				
MARRIAGE & CIVIL PARTNERSHIP					
Details of impacts identified	Not Applicable				

	Act 2010?
No	
4.	Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?
	her work is planned to take place in 2019 with fostering services in Brent and West London authorities.
5.	Please detail any areas identified as requiring further data or detailed analysis.
6.	If, following your action plan, negative impacts will or may remain, please explain how these can be justified?
7.	Outline how you will monitor the actual, ongoing impact of the policy or proposal?
Regu	ular reviews – performance meetings and performance indicators for looked after

3. Could any of the impacts you have identified be unlawful under the Equality

#### **SECTION C - CONCLUSIONS**

children will be used.

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

A remaining lack of sufficient fostering households to meet demand following the implementation of these changes. This risk is mitigated by making sure there will be regular performance management that puts recruitment and retention of foster carers under consistent scrutiny.

One local authority may benefit from the new arrangement more favourably than another. The risk will be mitigated by transparent and open protocols and processes agreed and relevant levels of authorisations granted. Regular reviews of fostering panel activity as well as retention of foster carers will take place.

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".	
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	х
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
С	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

#### **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
N/A			

#### SECTION F - SIGN OFF

Please ensure this section is signed.

OFFICER:	Onder Beter
HEAD OF SERVICE:	Onder Beter

<u>CYP005</u> Create additional local alternative education provision with enhanced activities for young people at the Roundwood Centre site

#### **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	CYP005
DEPARTMENT:	Children and Young People
TEAM:	Inclusion
LEAD OFFICER:	Bhavna Bilimoria
DATE:	07/01/2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### SECTION A - INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary of its objectives and the intended results.

This Equalities Assessment is in respect of the changes planned to the Youth Offer currently delivered by the Local Authority. In order to meet the needs of children at risk of permanent exclusion from school the Council intends to create more local provision by commissioning the creation of a new alternative provision school from the Roundwood Youth Centre site, enhancing the existing arrangements that are in place. Alongside this will be a greater youth and community offer from the site by enabling more use of the centre in the evenings, at weekends and school holidays.

The change of focus will be that an education provider, in partnership with the voluntary sector (including the Young Brent Foundation), will ensure new and enhanced services are offered to Brent's young people. The Local Authority will provide a co-ordinating function, making better use of its asset in the shape of the Roundwood site to meet the needs of children and young people who will benefit most from additional support outside the home.

The Local Authority has a responsibility under section 507b of the Education Act 1996 (as amended by Education and Inspections Act 2006) to secure, so far as reasonably practicable, sufficient educational and recreational activities which are for the improvement of young people's well-being, personal and social development, and sufficient facilities for such activities for young people aged 13 – 19, (or up to 25 for young people with additional needs).

The Council also has a statutory responsibility to publish a Youth Offer – a directory listing all provision across Brent. There is no requirement on the Local Authority to directly fund or deliver services to a particular level (or at all). Current Local Authority funded youth work programmes will end under the proposal.

#### **Current Delivery Model:**

- 1) Youth work activities. Following service reductions in 2016 the Council continued to directly provide youth work activities from the Roundwood Centre site. A team leader and a small part-time team of youth workers deliver activities for young people on 3 nights a week from the Roundwood site. A variety of activities are delivered on those 3 evenings including cookery, music production, table tennis, Wii sport, craft activities as well as positive mentoring by local authority youth workers. Providers from the voluntary sector deliver services on the remaining weekday evenings. Providers include: Sport at the Heart; The SAAFI Project; Zest of Mind; St. Michael and All Angels Church Steel band; Middlesex Cricket Club; The Challenge Project; QPR Community Trust.
- 2) 'Right Track'. Also operating during the day within term-time is a project called 'Right Track' which provides classroom based activities for a small number of young people who have received fixed-term school exclusions. The project is funded by Brent secondary schools and has demonstrated an effective model of intervention for children. 'Right Track' operates independently of the youth work provision from the site.
- 3) 16+ Education, Employment and Training Advice (Connexions). A Brent Council funded offer to provide advice and guidance to young people regarding their education, employment and training options is also based from the Roundwood site. This successful project has helped Brent to be in the top 20% of Local Authority's nationally in terms of the number of young people who are in education, employment and training. The project operates independently of the youth work provision from the site.

#### **Proposed Delivery Model:**

The plan is to transition the Roundwood Youth Centre site to a new provider, enhancing the current youth offer whilst connecting up the needs of young people at risk of school exclusion to positive activities outside of the school day. The needs of all Brent's young people who have been excluded cannot currently be met within the borough. Establishing a new site for alternative education provision will increase the numbers of young people who will receive their schooling closer to home, rather than out of the borough which is currently the case.

It is planned that the 16+ education, employment and training advice (Connexions) offer would continue to operate from the site with clearer links established to the new alternative education provision and wraparound youth activities so there is coordination of the various services on offer, based around the needs of individual young people.

The intended governance arrangements would bring the voluntary sector, potentially through the Young Brent Foundation and the Local Authority into a formal partnership

that will ensure a co-ordinated approach to all services as well as the ability to access a wider network of grant funding.

The Council has a statutory responsibility to publish a Youth Offer – a directory listing all provision across Brent. In the proposed new delivery model the Local Authority will continue to publish a Youth Offer. Work has been undertaken in the Local Authority to develop the online Youth Offer, 'Brent Youth Zone'. Council officers will continue to gauge feedback to improve the site to make it accessible to young people. The Council is also looking into the potential development of an App. to go alongside 'Brent Youth Zone'.

The expected outcomes of the new alternative provision and enhanced youth offer will be:

- To improve the educational outcomes of young people at risk of exclusion or who have been excluded from mainstream secondary school.
- To provide alternative, structured pathways into education, employment and training for the 16-19 age group, reducing still further the numbers of 'NEET' young people in the borough.
- To provide a comprehensive, up to date and all-encompassing Youth Offer that will include positive diversionary activities for the universal cohort of young people, contributing towards overall Council objectives that will:
  - give every child the opportunity to succeed;
  - create a borough where all can feel safe, secure, happy and healthy.
- 2. Who may be affected by this policy or proposal?

Changes to the Youth Offer will affect young people aged 13 to 19 (and up to 25 for young people with Special Educational Need and Disability (SEND)). Further detail is included in section B. Some Brent Council officers will also be affected as the proposals will affect the direct work currently delivered by youth workers at Roundwood Youth Centre.

Is there relevance to equality and the council's public sector equality duty?
 Please explain why. If your answer is no, you must still provide an
 explanation.

There is a relevance to the public sector equality duty in relation to fostering good relations within the community.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT			
	Positive	Neutral/None	Negative	
Age	Х	Х		
Sex		Х		
Race	Х	Х		
Disability		Х		
Sexual orientation		Х		
Gender reassignment		Х		
Religion or belief		Х		
Pregnancy or maternity		Х		
Marriage		X		

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	Х	
Does the policy or proposal relate to an area with known inequalities?	Х	
Would the policy or proposal change or remove services used by vulnerable groups of people?	Х	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	Х	

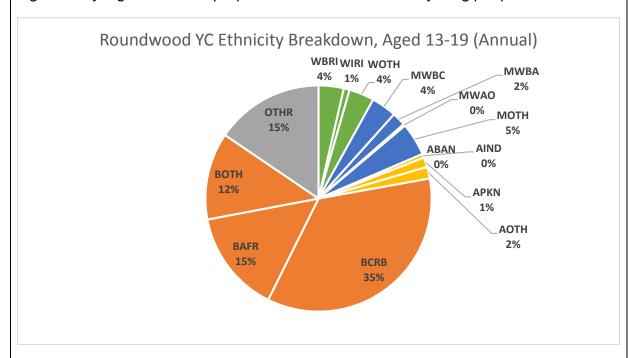
If you have answered YES to ANY of the above, then proceed to section B.

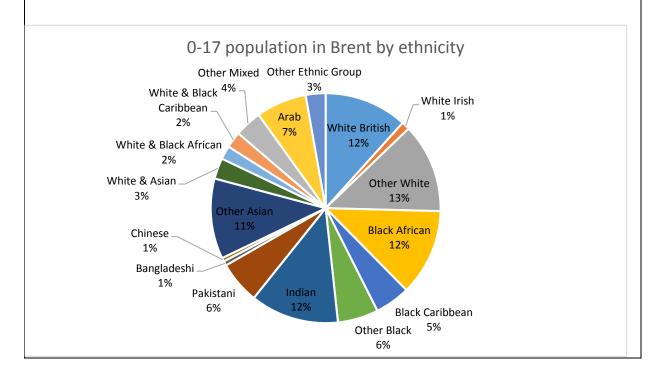
If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACT ANALYSIS**

 Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here. The GLA 2016-based Housing-led Ethnic Group Population Projections have been used to compare the ethnicities of the borough wide 0-17 cohort and the cohort that attend Roundwood Youth Centre. The figures taken from Roundwood Youth Centre are based on number of individual contacts.

In 17/18 361 young people aged 13-19 attended Roundwood Youth Centre. The ethnicity of the majority of young people in attendance was Black Caribbean, followed by Black African and Black Other. The proportion of Black Caribbean attendees is significantly higher than the proportion of Black Caribbean young people across Brent.





Enhancing the youth offer will have a beneficial impact upon young people, particularly from black ethnic backgrounds as these groups have the highest attendance at current youth provision.

More than 80% (as at January 2019) of young people who require alternative education provision attend a setting out of the borough. Improving the number of places within the local area will ensure young people can be educated closer to home, reducing travelling time and potential safeguarding risks for some young people.

Further information is required to determine the overall impact of a new alternative provision educational setting for young people of secondary school age. Initial judgements are based on professional opinion within the Inclusion Service and focus group discussions with local secondary school Head teachers, as well as the voluntary sector including the Young Brent Foundation.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

#### **AGE**

# Details of impacts identified

The proposed delivery model will continue to provide an open access youth offer and deliver positive diversionary activities for young people aged 13-19 (and up to 25 for young people with SEND). The proposed changes will see the Local Authority end their role in direct delivery of universal youth services by coordinating the alternative provision and voluntary sector offer. The potential positive impact will be the creation of more joined up, wraparound services being available to connect daytime educational provision with evening youth activities. This will also apply to the education, employment and training project. A potential negative impact for young people may be seen in any change to providers and individuals delivering services to them and some disruption to the continuity of service.

The Council has a statutory responsibility to publish a Youth Offer – a directory listing all provision across Brent. In the proposed new delivery model this will continue and so there is no anticipated negative impact.

#### DISABILITY

### The proposed delivery model aims to continue to provide a universal youth offer and deliver positive diversionary activities for young people aged 13-19 (and up to 25 for young people with SEND). There will be a positive impact for any young people with additional needs through the creation of alternative educational provision as the services will be available locally and can be connected to extra-curricular youth activities. This will enable any relevant young people with an education, health and care plan to receive services co-ordinated from the same venue. **Details of** impacts A potential negative impact for young people may be seen in any identified change to providers and individuals delivering services to them and some disruption to the continuity of service. The Council publishes information for children and young people with special educational needs and disabilities (and their parents/carers) via the Local Offer. The Local Offer signposts organisations and groups that are accessible to children and young people with special educational needs and disabilities (and their parents/carers) and this service will not be affected by the proposed changes. RACE Enhancing the youth offer will have a beneficial impact upon young from black ethnic backgrounds as these groups have the highest attendance at current youth provision. **Details of** As young people from black ethnic backgrounds are the largest impacts group attending current provision at the Roundwood site a identified potential negative impact may be seen in any change to providers and individuals delivering services and possible disruption to the continuity of service during a handover period. SEX Further investigation is required to understand the impact of the proposed changes on sex, however the proposed delivery model **Details of** will aim to continue to offer a universal youth offer and deliver impacts positive diversionary activities for young people aged 13-19 (and identified up to 25 for young people with SEND). Roundwood Youth Centre is accessed by young men and women (with a female only

session run on a Thursday). Further detail will be gathered on the

	female only session to determine any impacts that a change in service and/or provider would have.  SEXUAL ORIENTATION  There are no anticipated impacts for sexual orientation.		
Details of impacts identified	There are no anticipated impacts for sexual orientation.		
	PREGANCY AND MATERNITY		
Details of impacts identified	There are no anticipated impacts for pregnancy and/or maternity.		
	RELIGION OR BELIEF		
Details of impacts identified	impacts		
	GENDER REASSIGNMENT		
Details of impacts identified	The proposed delivery model will aim to continue to offer a universal youth offer and deliver positive diversionary activities for young people aged 13-19 (and up to 25 for young people with SEND) and any service provider would have to ensure they did not discriminate based on gender reassignment.		
MARRIAGE & CIVIL PARTNERSHIP			
Details of impacts identified	There are no anticipated impacts for marriage and civil partnership.		

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No			

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Over the past few years the Local Authority has consulted with young people, Roundwood Youth Centre users, Council staff and other stakeholders on the Youth Offer. Young people's views were gained from users of the Roundwood Youth Centre as well as Brent Youth Parliament, Care in Action / Care Leavers in Action and other focus groups. Young people were also consulted with as part of the Outcome Based Reviews related to Gangs and children on the edge of care.

The Brent Youth Zone website has been developed in collaboration with young people across the borough including Brent Youth Parliament and users of Roundwood Youth Centre. A questionnaire was distributed with around 40 responses giving feedback on what they would like from the website.

There has been ongoing consultation with education providers and the voluntary sector around the proposed Alternative Provision and how it could work within Brent.

As firm plans are developed, that will set out the commissioning intentions for the new provision, young people will be consulted and any amendments made to the specification as a result of this.

5. Please detail any areas identified as requiring further data or detailed analysis.

Further consultation with young people is required related to the specific delivery model proposed. This is proposed to occur by April 2019.

Further investigation is required to understand the impact of the proposed changes on sex.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The specification for the proposed Alternative Provision will clearly state the need for the inclusion of employment, advice and guidance services alongside an expanded youth and community offer aimed at young people after school, at weekends and during school holidays. The Local Authority also intends to be represented within the governance arrangements for the new provision in order to ensure wider Council objectives are realised. These approaches will mitigate any potential negative impact of the proposed changes. The Local Authority will have ongoing contract monitoring of any service specification, this will also include equalities monitoring. The Local Authority will signpost affected individuals to other services available including those within the Council's Early Help services or through the proposed Family Hubs.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

- Contract monitoring of any new procured service against service specification.
- Through data monitoring of school exclusion data and overall outcome measures for children attending the alternative provision.
- An annual survey of young people using the new out of school hours open access provision.

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The proposed policy to transform the Roundwood centre to an alternative educational setting with community youth activities will continue to provide positive diversionary activities for young people aged 13-19 (and up to 25 for young people with SEND) within Brent. It is 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 more connected approach based around the needs of individual young people.

The potential for negative impact as described above in section B 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. Some further investigation into the impact of the proposed changes on grounds of gender is required.

The proposed Alternative Provision will also support young people at risk of exclusion through offering alternative pathways into education, employment and training. This element of the proposal will have a positive impact on Brent young people.

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".		
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х	

В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
С	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

#### **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completio n Date	
Identify the sex (gender) of Roundwood Youth Centre users	Identify any impacts that may arise from information	Sarah Miller	By April 2019	
Consultation with young people across the borough (and directly in Roundwood Youth Centre) about the new service delivery model	Local Authority to gain the views of young people in the borough regarding the new service, and share the research with new provider	Sarah Miller	By April 2019	
Consultation with voluntary/community organisations in the borough (and directly in Roundwood Youth Centre) about the new service delivery model	Local Authority to gain the views of the voluntary/community sector regarding the new service, and share the research with new provider	Sarah Miller	By April 2019	
Consultation with current staff employed in Roundwood Youth Centre about the new service delivery model	Local Authority to inform and gain the views of the staff employed in Roundwood Youth Centre on the proposed changes	Sarah Miller	By April 2019	
Contract monitoring of any Alternative Provision and community activities aimed at young people procured for Roundwood	New provider to meet service specification such that community/youth offer is delivered	Sarah Miller	Termly as per contract	

# SECTION F - SIGN OFF

Please ensure this section is signed.

OFFICER:	Bhavna Bilmoria
HEAD OF	Sarah Miller, January 10 <sup>th</sup> 2019
SERVICE:	

#### CYP008 Develop family hubs from children's centres

#### **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	CYP008
DEPARTMENT:	Children and Young People
TEAM:	Early Help
LEAD OFFICER:	Sue Gates
DATE:	12/12/18

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Development of Family Hubs from the existing Children's Centres by reduction of the current number of 17 Children's Centres to 8 Family Hubs. Children's Centres remit is families with children 0-5 whereas Family Hubs will bring together the focus of whole family working from 0-19 (25 for those of SEND). Families currently accessing Children's Centres will still be able to access services through the Family Hubs. Children's Centres are well placed to transform into Family Hubs, they are well known, are non-stigmatising and are in a range of accessible locations and already offer a range of services delivered by Brent Council and partners. The actual sites are yet to be confirmed but the hubs will be targeted in areas of the borough with the highest usage and levels of deprivation as well as taking into consideration the size and locality of the current Children's Centre buildings.

The aims and objectives of the Family Hubs will closely align with the agreed Outcome Based Reviews that considered adolescents on the edge of care and involved in gang activity. The objectives will also be closely aligned to key public health outcomes related to children and their families in areas such as all children receiving timely ASQ reviews, childhood obesity and tooth decay.

It is anticipated that the affected families will be made aware of the changes through the centres, and formal reports that will be released after the budget consultation period. With the change / closure of any CC's, the council will also be required to carry out consultation as stated in accordance to statutory guidance from the DfE.

2. Who may be affected by this policy or proposal?

Families living in areas near to those children's centres that will close may not be able to access those support services as easily, meaning they will need to travel further, this can be more difficult for those with SEND.

Families affected will be informed at all stages of development, ensuring they are aware of their nearest Family Hub and what services they will still be able to access.

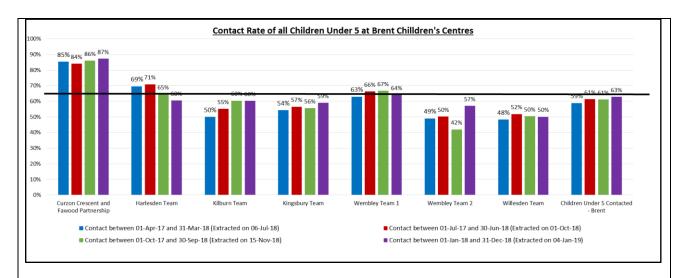
3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

People in particular age groups. Families with under 5's living in areas near to those children's centres that will close may not be able to access those support services as easily.

<b>Brent Und</b>	der 5 p	opula	tion e	estima	<u>tes</u>				
Data Source:									
2016-based den	nographic	projectio	ns, Londo	n ward po	pulation	projections Housing-le	d M	odel, releas	ed in 2017
Citation: © GLA 2	016-based [	Demograph	nic Projecti	ons					
Year / Age	Under 1	Age 1	Age 2	Age 3	Age 4	Total under 5		Difference	
Group						population		each year	
2018	5103	4970	4963	4880	4780	24696			
2019	5124	4986	4878	4864	4784	24636		-60	
2020	5130	4991	4883	4777	4762	24543		-93	
2021	5121	4992	4882	4773	4675	24443		-100	
2022	5106	4980	4882	4770	4669	24407		-36	
						Percentage decrease		1.17%	
						(from 2018 to 2022)			
NB: GLA popu	ılation es	stimates	are high	ner than	the data	provided by NHS			

From this data the 5-year projection of the under 5's population is expected to remain broadly the same as in 2018.

Based on the 2011 census, the under 5's make up 21% of Brent's population and from the 2015 JSNA it had increased by 11% taking the population of 0-5's up to 32%.



The current contact rates for the Locality teams within the Early Help service can be seen in the above chart. The current target is to reach 65% of registered children.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic		IMPACT	
	Positive	Neutral/None	Negative
Age			Х
Sex		Х	
Race		х	
Disability		х	
Sexual orientation		Х	
Gender reassignment		Х	
Religion or belief		х	
Pregnancy or maternity			X
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	х	
Does the policy or proposal relate to an area with known inequalities?		х

Would the policy or proposal change or remove services used by vulnerable groups of people?	х	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	х	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

 Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

2.

Outcome Based Reviews that were carried out by the council.

The community and affected families have been given the opportunity to complete the public consultation that opened in October 2018 and will run until the end of January 2019. Four Brent Connect meetings also took place for the public to attend to find out more about the proposed changes as part of the consultation. This consultation has also been promoted to the affected families through the existing Children's Centres.

Should this budget proposal be approved, statutory Children's Centre consultation will need to take place and consultation around the remit and location of the proposed Hubs will need to be carried out.

The annual impact study takes place for the Children's Centres, latest available data shows a 97% satisfaction rate for Brent CC's.

99% report positive impacts for themselves & 100% for their children from taking up support related to health & wellbeing.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE				
	A potential disproportionate impact on the most vulnerable families such as those requiring social care intervention mitigated by the creation of family hubs that will widen the age of support available and target the hubs in the areas of the borough with the greatest level of need.			
Details of impacts identified	Early intervention outcomes may worsen for children, such as those requiring social care intervention, health outcomes may worsen – for example tooth decay continues to worsen and obesity levels continue to rise. Other poor outcomes may include children achieving below the expected level for the Early Years Foundation stage profile and children with SEND left being undiagnosed therefore unable to access intervention when needed – further impacting on their educational achievements once they reach formal school age.			
	DISABILITY			
Details of impacts identified	Some families with disabled members may find it harder to travel to the Family Hubs as these may be spread across the borough.			
RACE				
Details of impacts identified	Not Applicable			
	SEX			
Details of impacts identified	Not Applicable			
SEXUAL ORIENTATION				
Details of impacts identified	Not Applicable			

PREGANCY AND MATERNITY			
Details of impacts identified	As integrated centres, there are services provided by the midwifery team around antenatal and postnatal support, closure of CC's may mean that some expectant / new parents will have difficulty accessing such support.		
	RELIGION OR BELIEF		
Details of impacts identified	Not Applicable		
	GENDER REASSIGNMENT		
Details of impacts identified	Not Applicable		
MARRIAGE & CIVIL PARTNERSHIP			
Details of impacts identified	Not Applicable		

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No as Family Hubs will be intended to have a 'whole family approach' allowing children and young people from 0-19 to access services from a hub, this is further extended to 25 if they have any SEND needs. The hubs will consist of targeted intervention and also some universal services that will be open to all.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Public consultation of the Budget Proposals is currently open, commenced from October 2018 and will run until end of January 2019. There have been 5 Brent Connect meetings in different parts of the borough as part of the public consultation. Feedback is currently unavailable as this consultation is still open, the council will compile a report on the findings. The Family Hub concept was created as a result of

an outcome based review that included considerable consultation with members of the public and voluntary sector organisations.

5. Please detail any areas identified as requiring further data or detailed analysis.

'Take-up' data within the Hub areas needs to be analysed to ensure it is reflective of the families within the area. Proposed outcome targets need to be established for the Hubs.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

It is not anticipated that negative impacts will remain.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Regular reviews - performance management cycle for the Family Hubs, (yet to be agreed) involves scrutiny on data against set targets which are also yet to be agreed, contract management with commissioned providers. Reviews are likely to take place on a quarterly basis.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Disproportionate impact on most vulnerable families - This risk is mitigated by the creation of family hubs that will widen the age range of support available to families who require support and target the hubs in the areas of the borough that have the highest usage and deprivation levels as well as considering the size and locality of individual centres.

Early intervention outcomes worsen for children - This risk is mitigated by ensuring the design of the new family hub model uses research findings to make best use of available resources and that these are broadened to cover school age children. This will allow greater reach of new targeted services into families than is currently possible with the existing model.

The Local Authority will need to ensure engagement with affected communities with the transfer to Family Hubs from Children's Centres at all stages. Families will be informed via the existing Children's Centres, signposting to the relevant reports and having the information readily available through the Brent website.

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".		
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	х	
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL		
С	CHANGE / ADJUST THE POLICY/PROPOSAL		
D	STOP OR ABANDON THE POLICY/PROPOSAL		

#### **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completio n Date
Consultation with users and stakeholders	Transparency and open discussion with those affected to discuss the purpose of Family Hubs and what they may look like.	Sue Gates	October 2019
Identification and commissioning of key partnerships necessary for Family Hub services to be delivered.	Key partnerships in place with agreed SLAs prior to Family Hub launch.	Sue Gates	October 2019
Closure of Children's Centres and transfer to Family Hub model.	Identified centres transferred to Family Hubs, bringing together a more integrated approach	Sue Gates	October 2020

	of working. Governance will need to be explored and agreed, this will involve key stakeholders forming a management committee. This will support with ensuring integrated working is fully developed.		
Continuous engagement with the community.	Community being kept up to date with the developments.	Sue Gates	Continuous
Early intervention services continue to take place within the Family Hubs, paying particular focus to those in target groups and most in need.	Families to still be able to access a range of services to support their needs at the right time, avoiding the need to further escalation.	Sue Gates	Continuous
Performance Management Cycle to be agreed and in place for Family Hubs	Family Hubs are regularly monitored with clear targets (that are yet to be agreed) but are likely to combine educational, health and economic objectives to delivering to a high quality service with appropriate support and guidance from LA. These will be monitored against the Performance Management Cycle which will include scrutinising data.	Sue Gates	To be agreed prior to October 2020 and be operational upon Family Hubs launch

# SECTION F - SIGN OFF

Please ensure this section is signed.

OFFICER:	Leena Choi
HEAD OF SERVICE:	Sue Gates

# RES003 and RES004 Service modernisation- reduced opening hours, more digital services and demand management

## **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	RES 003 and RES 004
DEPARTMENT:	Resources
TEAM:	BCS
LEAD OFFICER:	Margaret Read
DATE:	January 2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### SECTION A - INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Implementation of digital services to migrate contact handling from more expensive channels such as face to face and telephony. This will include implementation of Robotic Processing Automation and improvements to the current on line offer for customers to increase the number of enquiries handled through self-service facilities including diverting customers away from using telephone and face to face access methods where appropriate. I.e. where services can easily be accessed in this way

It is also proposed to launch a new Universal Offer to all residents which will set an expectation to self-serve using digital channels – in order to provide more personalised and tailored support to those who are most vulnerable. Customers needing help will be identified through a framework which will determine the type of assistance needed with staff empowered to deliver bespoke support required.

Review of current contact to identify key causes of failure demand and remedial action to address root causes and prevent this reoccurring.

## 2. Who may be affected by this policy or proposal?

Robotic processing will not directly affect customers with any protected characteristic – as this will change the way in which work is processed but not the nature of the service being delivered. Automated processes will reduce the need for staff to carry out less complex tasks however staffing reductions will be managed through natural turnover and as such will not directly impact staff.

As our digital offer improves, this will have a beneficial impact for customers as it will improve the ease with which they can self-serve. Customers are already required to

self-serve through digital channels following a change to the BCS operating model agreed by cabinet in November 2017. As specific changes are developed, any groups specifically affected will be identified.

Is there relevance to equality and the council's public sector equality duty?
 Please explain why. If your answer is no, you must still provide an explanation.

The changes proposed to achieve savings will not reduce or adversely affect the current service provided to customers but will improve the ease with which customers can access self-service facilities (with assistance where required), reduce processing time and will release capacity in order to deliver more tailored assistance to vulnerable customers ( as failure demand reduces ). As specific changes are identified through development of a new universal access offer, potential impacts of protected groups may arise and will be addressed through a further Equalities Assessment

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	х		
Sex	х		
Race	Х		
Disability	X		
Sexual orientation	х		
Gender reassignment	х		
Religion or belief	X		
Pregnancy or maternity	х		
Marriage	х		

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	х	
Would the policy or proposal change or remove services used by vulnerable groups of people?		х
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	х	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

 Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

A review of Access arrangements was undertaken between Sept 2018 and Jan 2019 and this identified the need to improve aspects of the current self-service offer for residents via the My Account portal. Approximately 45% of visitors to the Customer Services Centre advised that they had tried to resolve their enquiry through other channels, before visiting –including attempts to use self-service facilities such as online systems and attempting to get through on the telephone. Improvements to address the difficulties that customers are experiencing using self-service facilities including providing computer/device access and assistance to be able to use these facilities where needed should have a positive impact for all protected groups.

The revised offer to vulnerable residents which is being developed as part of the wider customer access review will take account of the specific barriers that are faced when using online services, particularly those who fall into protected groups. For example, this will include those that are digitally excluded i.e. don't have access to facilities and/or do not how to use online services together with other barriers that some face where even with significant degrees assistance are unlikely to be able to self-serve successfully.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached

these conclusions based on the information and evidence listed above. Where appropriate state "not applicable"

## appropriate state "not applicable". AGE Older people are less likely to be confident in using digital self service facilities. The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include **Details of** providing access to facilities, training, and assistance with impacts accessing services including through locality hubs and provision identified of assistance in peoples' homes where appropriate. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support DISABILITY People with learning disabilities and those suffering from mental health may find it more difficult to use digital self-service facilities and require assistance or provision of services in a different way. However, in some cases there will be a positive impact through provision of webchat and improved online facilities e.g. in the case of hearing and visual impairment. The newly developed offer to residents will clearly set out the **Details of** support and help available to them to access self service impacts facilities and also the arrangements for assisting them or identified providing services where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs and provision of assistance in peoples' homes where appropriate. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support RACE People whose first language isn't English may find it more difficult to use digital self-service channels. The newly Details of developed offer to residents will clearly set out the support and impacts help available to them to access self service facilities and also identified the arrangements for assisting them where they are unable to

self-serve. This may include translation services and facilities

	through the Council website, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support		
	SEX		
Details of impacts identified	impacts services including through locality hub. Residents that are able		
	SEXUAL ORIENTATION		
The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support.			
PREGANCY AND MATERNITY			
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.		
	RELIGION OR BELIEF		

Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve. This may include providing access to facilities, training, and assistance with accessing services including through locality hubs. Residents that are able to access services themselves by online self service will be diverted to use this method where appropriate in order to prioritise resources to assist those that need additional support.		
	GENDER REASSIGNMENT		
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.		
	MARRIAGE & CIVIL PARTNERSHIP		
Details of impacts identified	The newly developed offer to residents will clearly set out the support and help available to them to access self service facilities and also the arrangements for assisting them where they are unable to self-serve.		

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

As no negative impacts have been identified – engagement is not considered necessary at this stage, however it is likely that further engagement activities will be required as the new access offer is developed in order to test that it is fit for purpose.

5. Please detail any areas identified as requiring further data or detailed analysis.

A data set providing information on the breakdown of types of customers together with potentially protected groups will be captured and collated in order to inform development of the new access offer to Brent residents.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

Any remaining negative impacts will be identified and justified through another EA following development of the new access offer.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

A further EA will be carried out when the new access offer is developed further, including arrangements in place for vulnerable customers and those that will need assistance/support to self-serve.

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are no further actions identified as this stage but will likely be identified through a further EA on development of the revised access offer.

### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".	
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
С	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

## **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completio n Date
Undertake EA of new universal access offer and offer to vulnerable residents	To ensure that the revised access offer does not adversely impact on any protected group and develop any associated action plan	Sally Hodgson	April – May 2019

## **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Sally Hodgson
HEAD OF	Margaret Read ( Operational Director )
SERVICE:	

# RES011, RES011A, RES011B Review of Council tax support scheme - estimated 3, 7% or 15% reduction in total expenditure

## **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	RES011
DEPARTMENT:	Resources
TEAM:	Benefits (Customer Services Operations)
LEAD OFFICER:	David Oates
DATE:	9 January 2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

It is proposed to review the Council Tax Support scheme from 2020/21. There are currently three options proposed, which range from producing savings of £0.6m, £2.3m and £3.3m.

The exact mechanism in which this will be achieved has yet to be determined as detailed financial modelling is required to be undertaken.

Note that the figures quoted in these options are gross figures, i.e. they include the GLA precept.

2. Who may be affected by this policy or proposal?

Other than pensioners (who are protected by a prescribed national scheme) this proposal will affect those residents of working age who are currently eligible for council tax support (approximately 17,000 claimants).

The level of changes to the current scheme are not yet known but the individuals / groups impacted by the selection of changes is.

The exact impact on individuals or groups with protected characteristics will be determined by the final design of the scheme.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This proposal may have negative impacts on some equality groups, because to make the required saving some or all current claimants will receive less financial support. Efforts will be made to not disproportionately weight the impacts towards one group or other, however a disproportionate impact cannot be ruled out, especially if groups with certain characteristics are disproportionately protected under the current scheme.

The exact nature of the impacts will depend on the final design of the scheme

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		X
Sex	Cannot be predict	ed until the scheme	e design has been
Race	determined. A draft scheme an d provisional EA will		
Disability	be available in May 2019		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity	Cannot be pre	dicted until the sch	eme has been
Marriage		X	

**5.** Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	Х	
Does the policy or proposal relate to an area with known inequalities?		Х
Would the policy or proposal change or remove services used by vulnerable groups of people?	X potential	

Has the potential for negative or positive equality impacts been	Х	
identified with this policy or proposal?	As far as	
	possible	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

 Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The review of the current CTS scheme is still early in its design phase. The current scheme pays CTS entitlement based on a range of factors including age, disability, whether a claimant has dependent children or non-dependant adults in their household; level of income; size of property etc. Detailed equalities analyses have previously been made for the current scheme and found that the scheme impacts are spread evenly across protected and non-protected groups

The design of the new scheme has not yet been determined but similar factors need to be considered in its design, and the intention once again will be that impacts are not disproportionately felt by any particular group. However it is possible that the policy intentions of aspects of the scheme may result in a disproportionate impact on one of these groups. In such a case, the policy will be reviewed to establish whether or not the policy intention justifies the impact on the specific group.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	Pensioners  a protected group for the purposes of council tax support scheme so will not be financially affected, therefore the reduction in benefit will be borne by the remainder of those in receipt of Council Tax Support (those of working age)  Working age

	Claimants of working age will bear all the financial impact of the changes.
	DISABILITY
Details of impacts identified	Cannot be predicted until the scheme design has been determined. There is no evidence at this stage of an impact.
	RACE
Details of impacts identified	Cannot be predicted until the scheme design has been determined. There is no evidence at this stage of an impact.
	SEX
Details of impacts identified	Cannot be predicted until the scheme design has been determined. There is no evidence at this stage of an impact.
	SEXUAL ORIENTATION
Details of impacts identified	There is no evidence at this stage of an impact.
	PREGANCY AND MATERNITY
Details of impacts identified	Cannot be predicted until the scheme design has been determined. There is no evidence at this stage of an impact.
	RELIGION OR BELIEF
Details of impacts identified	There is no evidence at this stage of an impact

GENDER REASSIGNMENT		
Details of impacts identified	There is no evidence at this stage of an impact	
	MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	There is no evidence at this stage of an impact	

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No			

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, as part of the overall consultation exercise on the council's budget proposals. Further engagement is planned concerning the detailed proposals when formulated.

5. Please detail any areas identified as requiring further data or detailed analysis.

Detailed analysis of caseloads will take place as the new scheme design is designed.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The Council is required to make significant savings in order to deliver a legally required balanced budget (c£40m over the next four years). In order to help contribute to this target it is proposed to review the council tax support scheme as it represents a significant proportion of council expenditure (c£26m).

There are a number of actions that can be taken to help mitigate any negative impacts (including hardship grants and transitional protection), which will be explored further as the scheme design is developed and consulted on.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

If the Council Tax Support proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce Council Tax by up to 100%.

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is proposed to continue with the proposal despite the negative equality impacts. As reported above the Council is required to make significant savings in order to deliver a legally required balanced budget. The aim of the proposed changes is to save some scheme expenditure in light of further reductions to local government finance.

There are a number of actions that can be taken to help mitigate any negative impacts (including hardship grants and transitional protection), which will be explored further as the scheme design is developed and consulted on.

The Council will analyse its current caseload and produce figures showing the main groups of working age claimants getting Council Tax Support now and likely to be affected by changes to the current scheme. Extracts of the data will allow monitoring of the main types of people affected by the policy can take place as required.

## **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".			
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х		
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL			
С	CHANGE / ADJUST THE POLICY/PROPOSAL			
D	STOP OR ABANDON THE POLICY/PROPOSAL			

## **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completio n Date
Detailed financial and impact modelling	Better understand negative impacts and incorporate mitigating actions for negative impacts.	David Oates	April 2019
Public and stakeholder consultation	Better understand negative impacts and incorporate mitigating actions for negative impacts.	David Oates	June – September 2019

## **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Leigh Wood
HEAD OF	David Oates
SERVICE:	

### CWB021 Temporary housing to reasonable rents

## **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	CWB021
DEPARTMENT:	Community Wellbeing
TEAM:	Housing Needs
LEAD OFFICER:	Omari Gayle
DATE:	14/01/2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

#### **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

It is proposed to create a new scheme to increase the supply of affordable accommodation to help to meet the demand from homeless households. The Council currently makes use of 1200 properties in Brent under the Temporary Accommodation Housing Association Leased Scheme (HALS). These properties are leased from private sector landlords by partner Housing Associations. The number of these properties has been reducing year on year as the rates payable for HALS have increasingly diverged from the rents landlords can achieve elsewhere in the market. This contraction of affordable Temporary Accommodation in the borough is resulting in homeless households being housed in emergency B&B and other accommodation outside of Brent. The Reasonable Rent Scheme will enable the council to change the status of many of these leased properties, and to procure new properties as Registered Provider (RP) excluded tenancies and end the homelessness duty. In those circumstances, the accommodation would not be classified as Temporary Accommodation and the limits on Housing Benefit payable in RP leased accommodation would not apply. It would therefore be possible to pay landlords a more attractive lease rent, which would allow the properties to be retained, and the portfolio to be expanded at reduced cost to the Council

This will give tenants more stability and security, should halt the loss of properties and should allow more properties to be newly procured within the borough. This will reduce the need to place families in B&B accommodation or to accommodate them outside Brent.

2. Who may be affected by this policy or proposal?

The proposal primarily affects homeless households who the council has accepted the main rehousing duty to under homelessness legislation. The Council has been using the power under the Localism Act 2011 to end the main duty to homeless households with an offer of suitable accommodation in the private sector, called a Private Rented Sector Offer (PRSO). However, there is an insufficient supply of PRS accommodation that is affordable in Brent to meet this demand. Therefore, some accepted homeless households are still placed in to Temporary Accommodation. By increasing the supply of affordable accommodation to end the homelessness duty there will be a reduction in the need to use Temporary Accommodation to accommodate these households.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, some protected groups are over-represented among homeless households. This is partly due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households compared to their presence in the general population.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT			
	Positive	Neutral/None	Negative	
Age	Х			
Sex	Х			
Race	Х			
Disability	Х			
Sexual orientation	Х			
Gender reassignment	Х			
Religion or belief	Х			
Pregnancy or maternity	Х			
Marriage	Х			

5. Please complete each row of the checklist with an "X".

SCREENING CHECKLIST			
	YES	NO	
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	Х		
Does the policy or proposal relate to an area with known inequalities?	Х		
Would the policy or proposal change or remove services used by vulnerable groups of people?	Х		
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	Х		

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

 Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The proposal is part of the ongoing consultation on proposed amendments to the Council's Allocation Scheme, which is due to end on 21 January 2019. Once consultation has ended a paper will go to Cabinet in March 2019 for a final decision. However at this stage the proposal is recommended to be approved and therefore data is being collected to identify all the homeless households who the council has accepted the main rehousing duty in the last 3 financial years.

Further will be undertaken to break this data down to identify households with one or more of the protected characteristics to illustrate the impact of the proposal on each group. 2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE			
Details of impacts identified	See 1 above		
	DISABILITY		
Details of impacts identified	See 1 above		
	RACE		
Details of impacts identified	See 1 above		
	SEX		
Details of impacts identified	See 1 above		
	SEXUAL ORIENTATION		
Details of impacts identified	See 1 above		
PREGANCY AND MATERNITY			
Details of impacts identified	See 1 above		

RELIGION OR BELIEF			
Details of impacts identified	See above		
	GENDER REASSIGNMENT		
Details of impacts identified	See 1 above		
	MARRIAGE & CIVIL PARTNERSHIP		
Details of impacts identified	See 1 above		

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No			

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

As the proposal will affect households who the council accepts the main rehousing duty to in the future. Therefore it is not possible to engage with these. However, the homeless households who the council has already accepted the main rehousing duty to have been consulted as part of the consultation into the review of the Allocations Scheme

5. Please detail any areas identified as requiring further data or detailed analysis.

See 1 above		

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

Further work is required, however it is not anticipated that there will be any negative impacts

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Further work is required, however it is not anticipated that there will be any negative impacts and that the positive impact will be a reduction in the loss of properties available as well as an increase in the supply of affordable accommodation to help meet the demand from homeless households.

This positive impact will be enhanced by working in partnership with the Housing Associations to procure more properties than are currently in the HALS scheme to increase supply

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".			
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X		
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL			
С	CHANGE / ADJUST THE POLICY/PROPOSAL			
D	STOP OR ABANDON THE POLICY/PROPOSAL			

## **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completio n Date
Complete the data analysis as part of the EA for the review of the Allocation Scheme	Confirm the positive impact of the proposal	Omari Gayle	February 2019

# **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Omari Gayle
HEAD OF	Laurence Coaker
SERVICE:	

### Overall Council Tax increase of 4.99%

## **EQUALITY ANALYSIS (EA)**

POLICY/PROPOSAL:	Increase Council tax by 4.99% in 2019/20
DEPARTMENT:	Council wide
TEAM:	n/a
LEAD OFFICER:	n/a
DATE:	14 January 2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

## **SECTION A - INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council is required to make significant savings in order to deliver a legally required balanced budget. In order to help overcome this it is proposed to increase Council Tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. This will generate an additional £5.7m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc.

This will impact on all residents within Brent who are eligible to pay Council Tax. Under the changes that are being made to local government funding there is more emphasis on generating more funding locally (i.e. becoming more self-determinant). This proposal is linked to one aspect of local government funding where the Council has some discretion to raise additional funds by increases to Council Tax

2. Who may be affected by this policy or proposal?

All households in Brent, apart from those eligible for 100% Council Tax discount.

The increase by band and the number of properties affected are shown below.

Amount payable in 2018/19 (Brent share)	Amount payable in 2019/20 (Brent share)	Increase per annum	Increase per month	Increase per week	Total number of dwellings affected
£801.54	£841.56	£40.02	£3.34	£0.77	5,586

£935.13	£981.82	£46.69	£3.89	£0.90	12,979
£1,068.72	£1,122.08	£53.36	£4.45	£1.03	36,264
£1,202.31	£1,262.34	£60.03	£5.00	£1.15	34,565
£1,469.49	£1,542.86	£73.37	£6.11	£1.41	22,063
£1,736.67	£1,823.38	£86.71	£7.23	£1.67	6,379
£2,003.85	£2,103.90	£100.05	£8.34	£1.92	3,385
£2,404.62	£2,524.68	£120.06	£10.01	£2.31	249

If this proposal is approved, it will affect all households in Brent (121,470) that will see their Council Tax bills increase, unless they are eligible for 100% Council Tax support. Currently, approximately 16% (19,132 households out of the 121,470) of households in Brent receive full or partial Council Tax support, which means that they will receive full or partial protection from the increase. In addition those households where there is only one adult resident (33,942 households) receive a 25% reduction in their bill.

The Council Tax increase will mean that the budget of Adult Social Care services will grow by a further £2.3m which will enable the service to meet increasing demand of current and future service users who are among the most vulnerable members of Brent's community. This is a positive impact.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This proposal will have both positive and negative impacts on some equality groups. However, since the council tax is applicable to all properties it is not considered that the increase targets any one particular group rather it is an increase that is applied across the board. At the same time because the increase is applied to all properties it is not possible to exempt any particular groups. However, on the latter point there is a council tax support scheme that offers support to vulnerable people and people on low incomes. It should be noted that the council tax support scheme is also proposed to be reviewed from 2020/21 and therefore further analysis on the cumulative impact will be assessed as part of the modelling of the new scheme design. See equalities analysis on proposal RES011 for further details.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT			
	Positive	Neutral/None	Negative	
Age		Х		
Sex		Х		
Race		Х		
Disability		Х		
Sexual orientation		Х		
Gender reassignment		Х		
Religion or belief		Х		
Pregnancy or maternity		Х		
Marriage		Х		

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST				
	YES	NO		
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X			
Does the policy or proposal relate to an area with known inequalities?		Х		
Would the policy or proposal change or remove services used by vulnerable groups of people?		Х		
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	Х			

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

#### **SECTION B - IMPACTS ANALYSIS**

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The council has analysed the statutory council tax base return which shows the total number of households that are required to pay council tax and the households who are eligible for council tax support.

Other than this is not possible to conduct further impact analyses as the proposed Council Tax increase will affect households in Brent in different ways based on their financial circumstances. However low income households are likely to be protected as they will see increases in their Council Tax support which will either offset in full or partially this increase. The council tax support scheme is also proposed to be reviewed and further analysis on the cumulative impact will be assessed as part of the modelling of the new scheme design.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

	AGE				
Details of impacts identified	N/A				
	DISABILITY				
Details of impacts identified	N/A				
	RACE				
Details of impacts identified	N/A				

	SEX			
Details of impacts identified	N/A			
	SEXUAL ORIENTATION			
Details of impacts identified	N/A			
	PREGANCY AND MATERNITY			
Details of impacts identified	N/A			
	RELIGION OR BELIEF			
Details of impacts identified	N/A			
	GENDER REASSIGNMENT			
Details of impacts identified	N/A			
MARRIAGE & CIVIL PARTNERSHIP				
Details of impacts identified	N/A			

No			

3. Could any of the impacts you have identified be unlawful under the Equality

Act 2010?

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes to both. Significant engagement/ consultation has taken place since October 2018 and more is planned in January and February ahead of the decision being made by full council on 25 February 2019.

5. Please detail any areas identified as requiring further data or detailed analysis.

None required.			

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If the proposal is rejected, the Adult Social Care budget will not grow by £2.3m, which could pose challenges to the service to meet growing demand of current and future service users. Failure to meet the increasing demand and diverse needs of current and future service users would have a potential negative impact on those most at need.

The 1.99% increase in Council Tax for general use should have a positive impact on some equality groups as it prevents an additional reduction of £3.4m in the Council's budget. Without a specific alternative proposal the exact benefit to specific groups of residents, staff and external stakeholders is uncertain, but a reduction in budget at short notice will limit the scope of the Council to reduce the impact on services used by vulnerable groups of people.

While the Council Tax proposal will increase the financial pressure on some households, the Council Tax support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for Council Tax support. Further, single households will have the impact mitigated by the 25% discount offered to single households.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

If the Council Tax proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. This will take place when the council tax

support scheme is reviewed by undertaking a detailed analysis of caseloads. See equality assessment of RES011 for further details.

The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce Council Tax by up to 100%. The process for applying is detailed on the Council's website.

#### **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is proposed to continue with the proposal despite the negative equality impacts. The reason for this is that the Council Tax increase will help to protect front line services. The Council Tax increase proposed is equivalent to approximately £5.7m of additional funding, which if not made would have to be saved by services.

Brent has processes in place for applying a Council Tax support/reduction/exemption to those eligible, therefore whilst this increase will impact across the board, it is anticipated that the impact will be proportionate dependent on an individual's circumstances and whether they receive a Council Tax support/reduction/exemption. It should also be noted that the council tax support scheme is also proposed to be reviewed and further analysis on the cumulative impact will be assessed as part of the modelling of the new scheme design and where possible any negative impacts mitigated.

#### **SECTION D - RESULT**

	Please select one of the following options. Mark with an "X".	
Α	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	Х
В	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
С	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

## **SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Review impact of council tax increases at the same time as council tax support scheme is reviewed.	Better understanding of negative impacts, which can be reflected in the new scheme design	David Oates	September 2019

# **SECTION F - SIGN OFF**

Please ensure this section is signed.

OFFICER:	Ravinder Jassar / David Oates
HEAD OF	Ravinder Jassar / David Oates
SERVICE:	