

EQUALITY ANALYSIS GUIDANCE

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INTRODUCTION

Brent is committed to equality, diversity and inclusion; the council is determined to be an exemplar of good practice in equality, diversity and human rights and it is our policy to treat everyone fairly and with respect.

We aim to ensure that all our current and future residents, staff and stakeholders are treated fairly and receive appropriate, accessible services, and fair and equal opportunities.

This commitment requires that equality considerations play a key role in our decision-making processes and that our policies are fully compliant with the duties placed on us as a public sector body by the Equality Act 2010.

Equality Analyses (EAs) ensure that we follow through on our commitment to equality and they provide a method for clearly demonstrating the necessary legal compliance.

PURPOSE

This document provides detailed guidance for officers planning or carrying out EAs.

When carrying out an EA you should read this guidance in full and use it in conjunction with the accompanying EA template, for which it provides explanations and step-by-step instructions.

LEGAL CONTEXT

1. The Equality Act 2010

The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education.

The act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability.

2. Protected Characteristics

The Equality Act 2010 introduced the concept of “protected characteristics”, of which there are nine, as follows:

Characteristic	Description
Age	Older people, younger people etc.
Sex	A man or a woman.
Race	Race as a protected characteristic refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Disability	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.
Gender reassignment	The process of transitioning from one gender to another.
Religion or belief	Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
Pregnancy or maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Marriage and civil partnership	These have the standard legal meanings, but are only to be considered in respect of the need to eliminate discrimination (see section on public sector equality duty).

3. Public Sector Equality Duty

Under section 149 of the Equality Act 2010, public bodies such as councils must, in the exercise of their functions, have “**due regard**” to the need to:

- **Eliminate unlawful discrimination**, harassment and victimisation
- **Advance equality of opportunity** between people who share a “protected characteristic” and those who do not
- **Foster good relations** between people who share a protected characteristic and those who do not

These are generally referred to as the needs, or the three aims of the duty. This “**general equality duty**” must be fulfilled **before, and at the time of**, the exercise of a council function and each aim must be considered in turn: for example, the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.

To meet the duty when exercising its functions, the council should integrate equality considerations into its mainstream policy development and decision-making. It needs to be aware of and consider the effects of its activity by considering all of the following:

1. The need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic. In other words, the **indirect discriminatory** effects of a proposed decision.
2. **Equality of opportunity** is expanded by placing a duty on the council to have due regard to the need to remove or minimize disadvantages connected to a characteristic of a protected group; take steps to meet the needs of protected groups; and to encourage participation of protected groups in public life where participation is proportionately low.
3. In relation to **fostering good relations**, there is a duty to have due regard to the need to tackle prejudice and promote understanding.
4. There is also a specific requirement that councils must take steps to take account of a person’s disability and there is a duty to make **reasonable adjustments to remove barriers for disabled people**. What matters is how disabled persons are affected and not just whether a proposal affects a greater number of persons with disabilities than without. The duty is ‘anticipatory’. For example, Brent cannot wait until a disabled person wants to use its services but must think in advance (and on an ongoing basis) about what people with a range of impairments might reasonably need.

Definition of ‘due regard’

The Equality and Human Rights Commission advise that case law has established some key principles that explain what having ‘**due regard**’ means in practice:

- Decision-makers place equality considerations at the centre of policy formulation, side by side with other considerations.
- Decision-makers consciously consider the general equality duty as an integral part of the decision-making process, not just a matter of ‘box ticking’.

- Decision-makers have sufficient information to understand the effects of the policy, or of the particular decision, on the aims set out in the general equality duty.
- Decision-makers review policies or decisions if circumstances change (e.g. if the make-up of service users alters). This is vital as the duty is a continuing one.
- Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- Decision-makers consciously consider the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

WHAT EAs ARE FOR AND WHEN THEY ARE USED

1. What is the purpose of an Equality Analysis?

Equality Analyses (EAs) are a practical way of demonstrating compliance with the important statutory obligations described above. They provide a systematic method for accurately recording and evidencing that we have properly considered these obligations.

EAs help to ensure our decisions are made in a fair, transparent and accountable way considering the needs and rights of different individuals and communities, and they are designed to help identify, analyse, record and plan mitigation for any unintended consequences for particular groups or sections of the community arising from our decisions and proposals. They also help to identify where there are positive equality impacts, or indeed demonstrate that there will be no equality impacts at all.

An EA is a versatile tool. For example, consideration should be given to carrying out an EA before making decisions about changes to services, especially proposed service reconfigurations, reductions or closures. However, you can also use an EA to review the impact of existing policies, strategies and other arrangements from time to time.

2. When is an Equality Analysis required?

EAs should be used in support of decision-making, policy formulation, change initiatives, projects, service reviews and in the development of budget proposals.

If needed, an EA should be carried out at the earliest possible stage and should inform and shape policies and decisions as they develop and progress, and they should draw on relevant equality information and the results of any engagement activity. This provides the opportunity to address issues of inequality.

Equality considerations must inform the decision-making process itself and not be retrofitted to the decision after the fact as a box-ticking exercise. EAs should be living documents; as projects progress and further evidence of impacts become available, and unforeseen impacts emerge, they should be reviewed and updated to reflect any changes.

When there are complex and/or protracted decision-making processes, a separate EA may be needed at each key stage of the process.

Having ‘due regard’ to equality considerations across multiple functions may also involve assessing the impact on equality of decisions that are made together, such as a major review of services or when setting overall budgets. This means ensuring that you have sufficient information to understand the cumulative (or combined) impact of these decisions.

It is important to be clear that fulfilling the public sector equality duty is a separate legal process from consultation. A good consultation does not discharge the duty. An EA is concerned with what will be the actual impact of a measure, whereas a consultation is concerned with people’s views about it.

The following questions will help you to determine when an EA is required (but this is by no means an exhaustive list):

- Does the change or initiative have a significant effect in terms of equality on service users, employees or the wider community? (Remember that the relevance of a change or initiative will depend not only on the number of those affected, but also by the significance of the effect on them).
- Is it a major change or initiative, significantly affecting how functions are delivered in terms of equality?
- Will it have a significant effect on how other organisations operate in terms of equality?
- Does the change or initiative relate to functions that previous engagement has identified as being important to particular protected groups?
- Does or could the change or initiative affect different protected groups differently?
- Would the policy or proposal change or remove services used by vulnerable groups of people?
- Does it relate to an area with known inequalities (for example, access to public transport for disabled people, racist/homophobic bullying in schools)?
- Does it relate to an area where equality objectives have been set by the council in its Equality Strategy?

If the answer to any of the above is “yes”, you will need to carry out an EA.

3. When are equality impacts justified?

Not all policies can be expected to benefit all groups equally, particularly if they are targeted at addressing particular problems affecting one protected group. Policies like this, that are specifically designed to advance equality and demonstrate positive impact(s), will, however, also need to be assessed for their effect on equality across all the protected groups.

Assessing impact on equality is not simply about identifying, and mitigating or removing, negative effects or discrimination. It is also an opportunity to identify ways to advance equality of opportunity and foster good relations, and this can involve building positive action measures into the delivery of services. When decisions are likely to result in detrimental impacts on any group with a protected characteristic, they must be carefully considered and justified objectively. Adverse impacts must be explained as part of the formal decision-making process and attempts to mitigate any harm must always be explored, but it may not always be feasible to mitigate all negative equality impacts.

N.B. The quality of the EA is what matters, not how long it is. Make sure you write it so that people who are not experts in your area can understand it.

BRENT PROCEDURES

1. EAs at Brent

All EAs at Brent must now be done using the Brent EA template (Appendix 1). Full instructions for carrying out an EA using the template are given in the next chapter of this guidance.

2. Support with EAs

If you have any questions about EAs or would like further advice and guidance, the Policy and Scrutiny Team offers support. Please contact the team on equality@brent.gov.uk and they will reply within 5 working days.

Please note that wherever you are unclear you should consult the Policy and Scrutiny Team for advice. Please also note that Legal Services may need to be involved where discrimination or a clear risk of other non-compliance with the Act is identified. The above should all be factored into your timescales and adequate time should be always be allowed for potential amendments to be made.

Once completed, an EA should be sent to the Policy & Scrutiny Team for it to be reviewed. Once again, timescales should allow for any changes that may be required following advice.

3. Responsibility and sign-off

The role of the Policy & Scrutiny Team is advisory only and responsibility for EAs ultimately lies with the service making the relevant decision or carrying out the council function. An EA should therefore always be signed-off by the appropriate head of service or higher.

It is for the services themselves to demonstrate compliance with the Act and they must therefore ensure that EAs are properly carried out, signed-off, recorded, stored for future reference and published where appropriate. Where reports are published, it is usually expected that an associated EA would be published alongside it.

4. Human rights and socio-economic equality implications

While not specifically covered by the Equality Act 2010, at Brent it is considered a matter of good practice that, where relevant, an EA should also cover human rights and socio-economic equality implications, as these are priorities in Brent's Equality Strategy.

5. EAs for restructuring exercises

There is a separate process for assessing the equality impacts of restructuring exercises. Please contact your Senior HR Advisor for more information.

THE EA TEMPLATE INSTRUCTIONS

Section A – Initial Screening

Carrying out an initial screening will help to establish the relevance of the decision/policy/proposal to the council's equalities duties and whether or not a full EA is required. This stage is important because the need to meet with our equalities duties must be balanced with the need to streamline processes and avoid wasting resources.

A full EA **will not** generally be required if, through the initial screening, it is clearly demonstrated that:

- there will not be any negative equality impacts;
- the policy or proposal is not relevant to the council's equality duty;
- it does not relate to an area with known inequalities; and
- it will not change or remove services used by vulnerable groups of people

The screening provides a means of showing that equality has still been properly considered in respect of a policy or proposal for which a full EA is not deemed necessary.

When a full EA **is** considered necessary, the screening provides a means of summarising why this is the case.

A1 - Description

Use this box to provide a clear and detailed description of the policy, proposal, change or initiative. Clearly set out what it is planned to achieve, why it is required and what the key objectives and expected outcomes are.

A2 - Affected parties

Carefully consider who may be affected by this policy or proposal. Ensure that you consider service users, the general public, staff and external stakeholders. Use the box provided to give details.

A3 – Relevance to equality

This section is especially important. Carefully think about whether there is relevance to equality and the council's public sector equality duty. Consider which aspects of the policy are most relevant to equality; which of the three aims of the general equality duty are relevant, and which protected characteristics.

Think about the purpose of the policy, the context in which it will operate, who it should benefit, and what results are intended. At this stage you can start to think about potential impacts on people with different protected characteristics.

If it is clear at this point that you will be completing the full EA, a brief statement as the relevance of equality should suffice in this section.

If, however, you decide that a policy does not impact on any of the equality aims contained in the public sector equality duty, you will need to explain why here, including the reasons and the evidence and information that you used to reach this conclusion.

This information should also be included in the “Equalities Implications” section of any covering reports.

A simple statement of no relevance to equality without any supporting information is not sufficient, nor is a statement that no information is available. This could leave the council vulnerable to legal challenge, so obtaining early advice from the Policy and Scrutiny Team is essential.

If the Policy and Scrutiny Team advise that the policy is in fact relevant to equality, then you will need to continue and complete the full EA process. Therefore, review should be sought early, in case an EA is in fact necessary.

A4 - Potential or known impacts

Based on what is known, probable or possible from the available evidence at the time of the screening, consider each “protected characteristic” in turn and indicate with an “X” the potential or known impact of the policy or proposal. It is vital to carefully consider if the proposal will impact on people ***in different ways as a result of their characteristics.***

It is possible for negative and positive impacts to be identified against the same characteristic. Details of the particular impacts identified can be provided later in the template.

A5 – Checklist

Complete each row of the checklist to identify whether a full EA is required. If you answer **yes to any** of the checklist questions, you **will** need to complete the EA.

NB: Where there is a lack of certainty in respect of any of the checklist questions, or where there is insufficient evidence available to identify what impacts there will be, you should err on the side of caution and complete the full EA.

Section B – Impacts Analysis

B1 – Evidence and Data

In this section outline the research, information, data and engagement used for the analysis. Consider what information will give you a full picture of how well the proposal will work for different groups of people and how you will gather this information. How might engagement initiatives, research and equality monitoring data assist your analysis? Make sure that your work is proportionate to the initiative, don’t over-consult on a small change or under-consult on an important issue.

It is important that you have appropriate and reliable information about the different groups sharing protected characteristics that are likely to be affected. Understanding the impact on different groups is a key step in identifying whether a policy might unlawfully discriminate. The information that will be most useful will depend on the nature of the policy.

If you don’t yet have evidence, this does not prevent you carrying out a provisional EA, for instance, at the start of a project. The EA will need to be based on your considered judgement. As the project develops, you will need to source information and update the EA. Your plans should always be proportionate to the matter in hand.

However, in order to identify important impacts on people with different protected characteristics, it may be useful to look at:

- Any equality monitoring data available
- Comparisons with similar policies in other departments or authorities to help you identify relevant equality issues.
- Analysis of enquiries or complaints from the public to help you understand the needs or experiences of different groups of people.
- Recommendations from inspections or audits to help you identify any concerns about equality matters from regulators.
- Information about the local community, including census findings to help you establish the numbers of people with different protected characteristics.
- Recent research from national, regional and local sources that includes information on relevant equality issues.
- Results of engagement activities or surveys to help you understand the needs or experiences of people with different protected characteristics.
- Information from the public, and from voluntary organisations to help you understand the needs or experiences of people with different protected characteristics.

When analysing the evidence, you have gathered, consider the following questions:

- Do policy outcomes and service take-up differ between people with different protected characteristics?
- What are the key findings of any engagement you have undertaken?
- If there is a greater impact on one group, is that consistent with the policy aims?
- If the policy has negative impacts on people sharing particular characteristics, what steps can be taken to mitigate these effects?
- Is any part of the policy unlawful under the Equality Act 2010?
- Will the policy deliver practical benefits for certain groups?
- Does the policy miss opportunities to advance equality of opportunity and foster good relations?
- Do other policies need to change to enable this policy to be effective?

B2 – Impact details

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”.

B3 – Unlawful impacts

It is vital to consider if any of the impacts you have identified may be unlawful under the Equality Act 2010? Prohibited acts include direct discrimination, harassment, victimisation and failure to make a reasonable adjustment. If such impacts are identified, notify the Policy and Scrutiny, and Legal teams.

B4 – Engagement

Consider if the right people were targeted in any engagement work. If you do not have equality information about people who may be affected with particular protected characteristics, consider whether you need to fill information gaps.

This could mean undertaking short surveys, or some other engagement work. If it is not possible to collect this in time to inform your analysis, consider how you can increase your understanding in the short term before undertaking more robust research at a later date. This could mean, for example, meeting with stakeholders.

B5 – Future analysis

Further to question B4 above, note here what future analysis you plan to undertake. It is vital that information about the actual impact of the policy should be used to review the policy in future, where necessary.

B6 – Remaining impacts

The council must have due regard to the Equality Duty when taking decisions, but it also has a range of other responsibilities, including a duty to set a balanced budget.

Decision makers must balance any potential for detrimental impacts against the strength of legitimate need for the policy or service change to deliver savings or other justifiable reason.

The more serious the potential for any detrimental equality impacts, the greater the financial or other reason must be.

B7 – Monitoring and review

Assessing the impact on equality is an ongoing process that does not end once a policy has been agreed or implemented.

An EA will help anticipate and address the policy's potential impact, but the actual impact of the policy will only be known once it has been introduced, so it is important to carefully monitor actual, ongoing impacts.

This means it is also good practice to periodically review policies in respect of their equality impacts. Changing circumstances should also be considered when planning reviews. These might include a change in the area demographics, the availability of alternative services or the emergence of new ways to reduce adverse impact.

Section C - Conclusions

This section provides an opportunity to detail your overall conclusions based on your analysis, including whether mitigating actions are required to alleviate any negative equality impacts identified, and if so, what they are and what the expected outcomes should be.

Generally, where the policy is likely to have an adverse impact on large numbers of people who share a protected characteristic, greater weight should be given to the aims of the general equality duty. However, when the number of people affected is small, the weight given to equality considerations is not necessarily less if the policy would have a serious impact on the individuals concerned.

If positive equality impacts have been identified, consider what actions you can take to enhance them. Consider whether there are positive lessons here for policy development elsewhere and whether the approach could be promoted as an exemplar policy or best practice.

If you have decided that you must continue with the policy and justify it despite its adverse equality impacts, ensure that you detail your justification fully in this section.

Section D - Result

Select one of the 4 options provided, as follows:

a) Continue

Where analysis had demonstrated no negative equality impacts, you may wish to continue with the policy unchanged.

b) Justify and continue

Ultimately, there may be other factors (such as other policy aims or financial constraints) which make it reasonable for you to decide to adopt the policy despite its adverse equality impact. You can choose this option where your policy does not unlawfully discriminate, or where any potential discrimination is indirect and can be objectively justified. You need to take into account the possibility that your decision could be challenged and consider whether you would be able to satisfy a court that you had “due regard” to the aims of the general equality duty when you reached this decision. It is vitally important that you document the reasons for your decision and the evidence that supported these reasons when you note your conclusions.

c) Change

This involves making changes to the policy to ensure it does not adversely affect certain groups of people or miss opportunities to affect them positively. This can involve taking steps to mitigate adverse impacts, or to bolster or tailor positive ones. It is lawful under the Act to treat people differently in some circumstances (such as putting in place single-sex provision where there is a need for it or adopting proportionate positive action measures that benefit people sharing protected characteristics). Document in your conclusions the reasons for the steps you are adopting and the information you used to make this decision.

d) Stop

If you find that the policy unlawfully discriminates, or the policy will carry extensive negative equality impacts, which it is not possible to mitigate, you may choose to abandon the policy or proposal altogether.

Section E - Action Plan

List all the steps you have identified to reduce the negative impacts; outline what a successful outcome will be; the officer(s) responsible for the action; and the expected date of completion for each.

You should also list how you will address any gaps in knowledge; any monitoring arrangements; plans for further engagement and analysis, and when the policy will be reviewed.

You can also list any actions you will take to advance opportunities for improvement where positive impacts have been identified.

Section F – Sign-off

Once the completed EA has been reviewed by the Policy & Scrutiny Team, it should be signed off by the relevant head of service, recorded and stored for future reference.

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Inclusive Growth Strategy (IGS)
DEPARTMENT:	Regeneration & Environment
TEAM:	Regeneration
LEAD OFFICER:	Jonathan Kay
DATE:	14 th October 2019

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

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 Inclusive Growth Strategy (IGS) is a long term strategy to accompany forecast change, including population growth, demographic change and resource pressures, across the borough to 2040. If growth is to be inclusive, then the IGS proposes that everyone must participate and share fairly in the increased prosperity it brings.

The IGS examines baseline evidence and key growth trend data across demographic and socioeconomic factors that make up and affect the borough, and is divided into 7 themes: Culture, Economy, Education & Skills, Environment, Health, Housing and Infrastructure over the next 20-years.

IGS policy responses frame objectives and are underpinned by an annexed action plan that sets out concrete initiatives to address the challenges and seize the opportunities of growth as we move towards 2040.

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

In theory, were the IGS and annexed action plan to be fully implemented, then everyone living or working in the borough may be affected.

Analysis is that IGS policy responses and initiatives could positively benefit various groups that may be affected by forecast change in the borough. Specifically, the IGS identifies responses that could benefit both young and old people, women (including women returning to work following maternity leave) and BAME groups in the borough.

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

Yes, there is relevance to the council's public sector equality duty, and due regard to such is paid in drawing up this equality analysis.

The underlying principle of the IGS is that if growth is to be inclusive, then everyone must participate and share fairly in the increased prosperity it brings.

Examining the baseline evidence and key growth trend data, circumstances are identified where people with protected characteristics are observed to be disadvantaged, and where they might reasonably be expected to be disadvantaged by change moving forward to 2040, including in such fundamental areas of society and human life as the economy, education and skills, and health. The IGS proposes policies and an annexed action plan which seek to respond to the evidence, and to address inequality through objectives and interventions designed to reduce disadvantage and improve people's quality of life and life chances.

The IGS therefore chiefly helps the council meet its Public Sector Equality Duty by aiming to ensure that growth does not only not discriminate against people living and working in the borough, but rather advances equality of opportunity for all, including disadvantaged groups.

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?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative equality impacts been identified with this policy or proposal?		X
<p>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.</p>		

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 IGS examines baseline evidence and key growth trend data across the broad sweep of demographic and socioeconomic factors that make up and affect the borough. Evidence has been drawn from external sources including Census data 2011, ONS, NOMIS, GLA Datastore, Public Health England and the Office of Budget Responsibility, and internally from Council directorates. Policy responses underpinned by an annexed action plan have then been set out for each of the 7 themes.

Growth trends which will affect the borough moving forward over the next 20 years include:

- Growing population
- Ageing population
- Demand for infrastructure, housing and resources
- Increasing self-employment
- Changing work and consumption patterns
- Increasingly high skilled labour market
- Automation and technological advances
- Climate change

In drawing up the IGS and policy responses, we have consulted with the Policy Coordination Group, Council Management Team, Departmental Management Team, and departments across the Council. Consideration has been given to the potential impacts growth trends may have upon the borough, including on currently disadvantaged groups. Each theme also has a corresponding Senior Officer theme lead, who has assessed the proposed policy responses, providing commentary, specialist input and a direct steer to the IGS.

Focus for this equality analysis is upon the IGS policy responses and annexed action plan, as it is their implementation which would potentially impact people with protected characteristics. Analysis is high level as the policy responses and actions have not yet been implemented. Given the wide scope of the IGS, emphasis is placed upon policy responses and actions which would most obviously have an impact on people with protected characteristics. Specifically, policy responses and actions that name people with protected characteristics, and which if implemented propose monitoring and evaluation, promotion and awareness raising, programmes and partnerships, allocation of resources, and other activities, that would involve or have the potential to involve those named groups.

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	<ul style="list-style-type: none"> <p>• IGS Economy Policy Response 5: Adult Skills Strategy: Develop an adult skills strategy which aims to equip the population with skills needed for the future economy and is accessible at all stages of life. Action Plan EC5.2 proposes regularly monitoring priority age and ethnicity groups to inform the design of Skills Escalator programmes. POSITIVE</p> <p>• IGS Education & Skills Response 3: Support Older Workers: Support older workers to have fulfilling working lives. Policy ES3 responds to the ageing population and expected increase in older workers. Action Plan ES3.1, 3.2, 3.3 and 3.4 all set out initiatives to support older workers. POSITIVE</p> <p>• IGS Housing Response 6: Specialist Housing Provision: Brent Council will promote awareness and secure greater development of specialist housing provision, including inter and multi-generational housing, as well as housing for those with additional and complex needs. Policy H6 and Action Plan promotes housing solutions to benefit, and foster good relations between, young and old people. POSITIVE</p> <p>• IGS Environment Response 1: Modal Shift: Deliver a modal shift away from car use (with exceptions) and increase safety and accessibility to public transport and active travel. Policy EN1 recognises exceptions when seeking to deliver a modal shift away from car use. Any initiatives moving forward must pay due regard to potential impacts on, for example, older people or people with disabilities. NEUTRAL</p> <p>• IGS Health Response 1: Targeted Prevention & Interventions: Brent will encourage healthier lifestyles and support partner delivery of tailored approaches to specific health issues to take a preventative approach to health problems, better manage the cost and impact they have in the borough, and provide a better service. Policy HE1 references diabetes, obesity and dementia. Any targeted preventions and interventions for dementia would be expected to benefit older people. POSITIVE.</p> <p>• IGS Health Response 2: Independent Living & Self Care: Brent will work to ensure that older people and those with additional needs have the opportunity to live independently for as long as possible. Policy HE2 and Action Plan sets out a number of initiatives (in housing, the wider environment, and through design and technology) to promote independent living and self care amongst Brent's ageing population. POSITIVE.</p> <p>• IGS Health Response 3: Social Prescribing for Wider Determinates of Health: Brent will support the use of preventative and community based non-medical responses to create the conditions to support people in adopting healthier lifestyles. Policy HE3 and Action Plan promote social prescribing support and activities targeted at older people and young people in more deprived areas. POSITIVE.</p>

	<ul style="list-style-type: none"> • IGS Health Response 4: Creating Healthy Environments: Brent will support restaurants, workplaces, schools and other places where residents are spending time to ensure they are designed and run in a way which promotes good health outcomes. Action Plan HE4.1 and 4.2 focus on actions to create healthy environments which would benefit children. POSITIVE. • IGS Culture Response 1: Growth in the Creative Economy: Brent will support growth of the creative and cultural industries and the creative economy. Action Plan C1.1 specifically targets increased involvement in the arts for children and young people. POSITIVE. • IGS Culture Response 5: London Borough of Culture 2020 Legacy: Create a legacy from the London Borough of Culture 2020 award, building on successes and driving forward the cultural life of the borough. Action Plan C5.3 focuses on developing creativity in young people from diverse backgrounds. POSITIVE. • IGS Culture Response 7: Facilitate Tourism Growth: To promote tourism in Brent relevant partners should work together to formulate a strategic vision for tourism in the borough. Action Plan C7.2. identifies opportunities for younger and older people to get involved in local tours. POSITIVE.
DISABILITY	
<p>Details of impacts identified</p>	<ul style="list-style-type: none"> • IGS Housing Response 6: Specialist Housing Provision: Brent Council will promote awareness and secure greater development of specialist housing provision, including inter and multi-generational housing, as well as housing for those with additional and complex needs. Policy H6 and Action Plan H6.2 promote housing solutions to benefit people with specialist mental health needs and physical disabilities. POSITIVE • IGS Environment Response 1: Modal Shift: Deliver a modal shift away from car use (with exceptions) and increase safety and accessibility to public transport and active travel. Policy EN1 recognises exceptions when seeking to deliver a modal shift away from car use. Any initiatives moving forward must pay due regard to potential impacts on, for example, older people or people with disabilities. NEUTRAL • IGS Infrastructure Response 5: Influence and Leadership: Brent Council will raise its profile and influence in lobbying for changes in vital infrastructure for the borough. Action Plan I5.4 proposes to lobby TfL to implement step free access in all Brent growth areas. POSITIVE • IGS Health Response 2: Independent Living & Self Care: Brent will work to ensure that older people and those with additional needs have the opportunity to live independently for as long as possible. Action Plan proposal HE2.2 to expand the NAIL programme, 2.3 for a more accessible built environment and 2.6 for technology to manage health conditions would all benefit people with physical or mental impairments. POSITIVE.

	<ul style="list-style-type: none"> IGS Culture Response 4: Culture on the High Streets: Brent will make high streets a gathering place for social interaction and cultural exchange, Action Plan C4.5 has the potential to improved access to the arts for people with physical or mental impairments. POSITIVE.
RACE	
Details of impacts identified	<ul style="list-style-type: none"> IGS Economy Policy Response 5: Adult Skills Strategy: Develop an adult skills strategy which aims to equip the population with skills needed for the future economy and is accessible at all stages of life. Action Plan EC5.2 proposes regularly monitoring priority age and ethnicity groups to inform the design of Skills Escalator programmes. POSITIVE IGS Economy Policy Response 9: Fairness Agenda: Promote the Fairness agenda in the borough by getting businesses to sign up to fair practices. Action Plan EC9.2 proposes Council services and advice to people in less secure employment, evidenced to be disproportionately represented by black workers. POSITIVE IGS Education & Skills Response 1: Support Underperforming Groups: Reduce inequality and the educational and employment gap between different demographic groups in the borough by targeting priority underperforming groups. Policy ES1 aims to reduce inequality and the educational and employment gap for priority underperforming groups. Action Plan ES1.1 and 1.3 reference successful initiatives for young BAME men. POSITIVE IGS Health Response 1: Targeted Prevention & Interventions: Brent will encourage healthier lifestyles and support partner delivery of tailored approaches to specific health issues to take a preventative approach to health problems, better manage the cost and impact they have in the borough, and provide a better service. Policy HE1 references diabetes, obesity and dementia and Action Plan HE1.2 proposes the Council raise awareness of diabetes. The BAME population would expect to benefit from any targeted prevention and interventions for diabetes, given their predisposition to diabetes. POSITIVE. IGS Health Response 2: Independent Living & Self Care: Brent will work to ensure that older people and those with additional needs have the opportunity to live independently for as long as possible. Action Plan HE2.4 promotes partnership working to ensure diverse communities are considered when supporting older and vulnerable residents with independent living. POSITIVE. IGS Culture Response 5: London Borough of Culture 2020 Legacy: Create a legacy from the London Borough of Culture 2020 award, building on successes and driving forward the cultural life of the borough.

	<p>Action Plan C5.3 focuses on empowerment and creativity in young people from diverse backgrounds. POSITIVE.</p>
<p>SEX</p>	
<p>Details of impacts identified</p>	<ul style="list-style-type: none"> IGS Economy Policy Response 8: Support Women into Work: Increase female participation in education, employment or training within Brent. Policy EC8 and Action Plan responds to observed lower female economic activity rates in Brent. POSITIVE IGS Education & Skills Response 2: Improve Skills Levels for Women: Raise skills and employment for women in the borough Policy ES2 and Action Plan responds to observed lower female economic activity rates in Brent. POSITIVE
<p>SEXUAL ORIENTATION</p>	
<p>Details of impacts identified</p>	<ul style="list-style-type: none"> No obvious impact upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis. Were the IGS policy responses and annexed action plan to be implemented, further equalities analysis is advised.
<p>PREGANCY AND MATERNITY</p>	
<p>Details of impacts identified</p>	<ul style="list-style-type: none"> IGS Economy Policy Response 8: Support Women into Work: Increase female participation in education, employment or training within Brent. Policy EC8 responds to lower female economic activity rates in Brent. through return to work apprenticeships. Action Plan EC8.1 and 8.3. promote childcare options and return to work apprenticeships which would help support women into work after giving birth. POSITIVE. IGS Economy Policy Response 9: Fairness Agenda: Promote the Fairness agenda in the borough by getting businesses to sign up to fair practices. Policy EC9 and Action Plan EC9.1 and 9.2 seek to respond to the increase in the temporary work which can often not protect key employment rights, including maternity leave. POSITIVE. IGS Education & Skills Response 2: Improve Skills Levels for Women: Raise skills and employment for women in the borough. Policy ES2 responds to lower female economic activity rates. Action Plan ES2.1, 2.3 and 2.4 reference initiatives to co-locate skills services, promote childcare and encourage flexible workplaces. POSITIVE. IGS Education & Skills Response 4: Supporting People into Work: Brent will build on and facilitate training opportunities,

	<p>careers advice and guidance for those getting into the job market.</p> <p>Action Plan ES4.3 aims to increase maternal employment in Brent through targeted apprenticeship programmes.</p> <p>POSITIVE.</p>
RELIGION OR BELIEF	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impact upon groups with the protected characteristics of Religion or Belief is identified in this equality analysis. Were the IGS policy responses and annexed action plan to be implemented, further equalities analysis is advised
GENDER REASSIGNMENT	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impact upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis. Were the IGS policy responses and annexed action plan to be implemented, further equalities analysis is advised
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<ul style="list-style-type: none"> No obvious impact upon groups with the protected characteristics of Marriage & Civil Partnership is identified in this equality analysis. Were the IGS policy responses and annexed action plan to be implemented, further equalities analysis is advised

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?

N/A

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

N/A

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

N/A

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

Were the IGS policy responses and annexed action plan to be implemented, further equalities analysis is advised, including whether a proportionate equalities monitoring regime to measure the scale of impacts on groups with protected characteristics is appropriate for each particular action or initiative to be implemented.

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 IGS has been drawn up with the overarching aim that everyone should participate and share in the benefit of growth.

Implementation of the IGS policy responses and annexed action plan is assessed as likely to advance equality of opportunity in the borough, with a number of positive impacts identified for the younger and older population, people with physical and mental disabilities, people from diverse backgrounds, including from BAME groups, and women, as well as for pregnancy and maternity.

A neutral impact is identified with respect to proposed policy to deliver a modal shift away from car use (with exceptions). Implementation of any initiatives to that effect would need to pay due regard to potential impacts on, for example, older people or people with disabilities.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	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 and dated.

OFFICER:	Jonathan Kay, Senior Regeneration Manager
REVIEWING OFFICER:	Meenara Islam, Strategic Partnerships Manager
HEAD OF SERVICE:	Alice Lester, Operational Director, Regeneration, Growth & Employment

