

Appendix C (v): Cumulative Equalities Assessment: Budget Proposals 2021/22 – 2022/23

1 INTRODUCTION

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

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

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

Equality, diversity and inclusion are key priorities for the council. Our Equalities Strategy drives forward this work and seeks to embed equalities in everything we do. We seek to ensure that all residents, employees and stakeholders are treated fairly and receive appropriate, accessible services, and fair and equal opportunities. This commitment requires that equality considerations play a key role in our decision-making processes and in understanding the effect of our policies and practices.

Approach to considering equalities

As part of our budget-setting process, all budget savings proposals are subject to an Equality Analysis (EA) screening, which helps to establish their relevance to the council's equalities duties and determine whether a full EA is required. The screening assesses the potential or likely impact on service users and employees with protected characteristics. Guidance issued to all officers on how to undertake an EA, provides that a full EA will not be required if it is clearly demonstrated that there will be no negative equality impacts.

¹ Bullet points 2 and 3 do not apply to marriage and civil partnerships.

This document highlights the equality impacts for the 16 2021/22 to 2022/23 budget proposals. Individual EA screenings for each proposal and full Equality Analyses are attached.

Initially, two proposals – CDS A2 (customer access) and R&E A2 (passenger transport) – were identified as requiring a full EA. Following review of all 16 budget proposals by the equality team, there were a further two proposals where it was felt more information was required, and requests were made for EAs for these as well – CYP A3 (Gordon Brown Centre) and CYP B1 (integration with health). The equality impacts concerned with these four proposals are summarised in this report. The council must carefully consider and have regard to the impact of its savings proposals on the PSED; and take a reasonable and proportionate view regarding the overall impact and seek to mitigate negative impacts where possible.

It is important to note EAs are living documents and if - as projects/proposals develop and further evidence of impacts becomes available – any unforeseen impacts emerge, they should be reviewed.

Overall Assessment

The proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

One of the savings proposals may have a temporary negative impact on equality of opportunity and may have a negative impact on opportunities to promote good relations.

Some of the proposals have the potential to cause a positive impact on equality of opportunity – specifically in relation to the safeguarding and embedding of services that target and provide support and services to some of our most vulnerable residents

These impacts will be kept under review, as well as any other others that are identified during the timeframe of the live EAs.

2 DEMOGRAPHY OVERVIEW

Key facts about Brent's demographic profile are taken from the data sources [Population change in Brent](#) and the [Equality profile of Brent](#). They show the make-up of the borough, help us to identify potential impacts; and identify the increasing pressures and demand for council services.

- Brent is home to around 335,300 residents and is the seventh largest borough in London.
- The borough has a population density of 7,652 people per square kilometre – the 14th highest density in England, and the highest in Outer London.
- Brent has high levels of population churn: in 2017-18, 32,600 people moved into the borough and 34,000 moved out – a turnover rate of 201 per 1000 population – 24th highest out of 317 areas in England, and second highest across Outer London.
- Brent's population increased by 27% between 1998-2018. In recent years, the borough's population change has been driven, primarily, by natural change (more births than deaths) as opposed to net migration. The birth rate has fallen over the year but remains well above the national average.
- Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.
- In line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, by 12% by 2041 (+8,600 children).
- Population growth will be concentrated in the areas where significant housing development is planned. The wards of Tokyngton and Alperton are expected to see the fastest growth: considered together, they are projected to accommodate an additional 47,600 residents by 2041.

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

Age

- Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). In Brent, 29% of the population is aged over 50 compared with 37% across England. Conversely, 39% of the borough's population is aged 25-49 compared with 33% in England. Brent has a higher proportion of children aged under ten compared with England (14% vs. 12%). The population has been ageing in recent years and this is expected to continue.

Disability

- Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

Gender reassignment

- The Government Equalities Office tentatively estimates that around 0.3-0.8% of the UK population are transgender. In Brent, this would equate to between 1,000 to 2,500 people. Since the Gender Recognition Act came into force, only a small minority have obtained a Gender Recognition Certificate: 0.007% of the UK population (4,910 people across the UK since 2005).

Marriage and civil partnership

- In 2015, 960 marriages or civil partnerships took place in Brent – of these, 29 (3%) were same sex marriages or civil partnerships, the same as the percentage nationally but lower than the percentage in London (5%).

Pregnancy and maternity

- Brent has relatively high birth rates. In 2018, there were 4,705 births in Brent – which equates to 68.1 births per 1,000 women aged 15 to 44 – well above the national rate (59.2). Three quarters of all births in Brent were to women born outside the UK (75%) – this is the highest rate in England and Wales, reflecting the diversity of the borough's population.

Race

- Two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson's Diversity Index).

Religion or belief

- The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Overall, 82% of residents had a religion – the fourth highest rate in England and Wales. The borough has the second largest Hindu population in England and Wales, and the 10th largest Muslim population (as a percentage of the population).

Sex

- The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 62% of those aged 85 and over are female.

Sexual orientation

- Statistics about the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 4.6% of Brent residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – below the London average (5.4%) but above the national rate (3.3%). Figures from the 2017 Annual Population Survey provide lower estimates for both London and England (3.2% and 2.6%).

3 IMPACT OF SAVING PROPOSALS

Summary of 21/22 – 22/23 budget proposals

Although initial equality screenings have been undertaken to ascertain impact in terms of the Public Sector Equality Duty (PSED), some of the proposals are in their formative stages and still to be developed or are subject to consultations. Consequently, as the proposals are developed further equality analysis will be undertaken to assess the PSED. It is important to note that several of the proposals have identified no impact on the PSED.

The proposals are:

Chief Executive

- CE A1 Finance – Reduce an assistant account post
Savings achievable through efficiencies expected from implementation of the Oracle cloud, and more efficient working practices. No impact on the PSED.
- CE A2 Finance – Energy savings
Savings are expected from reduced energy usage in council-owned buildings. No impact on the PSED.
- CE B2 Legal services – restructure in legal team
Reduction of principal lawyer posts by one, enabling a team restructure.
- CE B5 HR – restructure in HR team
Deletion of two posts and redistribution of essential functions. Cessation of routine Occupational Health checks on new recruits.

Assistant Chief Executive

- ACE A1 Executive & member services – Executive support team
Deletion of 1.5 vacant posts (executive support assistant). No impact on PSED.
- ACE A2 Executive & member services – Governance
Deletion and realignment of posts (NB proposal is contingent on staying with virtual or physical meetings i.e. not moving to hybrid meetings).
- ACE A3 Executive & member services – Chief Executive Office
Reduction of various small budget lines. No impact on the PSED.

Children & young people

- CYP A3 Gordon Brown Centre
Expanded use of the centre, either supporting families with children at risk of being taken into care or as residential provision for Looked After Children, to realise either cost avoidance or additional income. A full Equality Analysis was requested for this proposal.
- CYP B1 Integration with health
Opportunities to deliver more efficient commissioning and service delivery. A full Equality Analysis was requested for this proposal.

Community wellbeing

- CWB C2 Housing – salaries capitalisation
Increase the level of staff costs that are capitalised within Housing Partnerships annually, leading to a reduction in the revenue budget required. No impact on PSED.

Customer & digital services

- CDS A2 Operations – review of front-face offer
Full review of customer offer, including creation of a new Civic Centre community hub. A full Equality Analysis was requested for this proposal.
- CDS A4 Customer services – revenue and debt
Reduction of vacant enforcement service manager post. No impact on the PSED.
- CDS A5 Customer services – resilience contract
Review of benefits assessment process and scale 6 assessment officer posts.

Regeneration & environment

- R&E A1 Capitalisation
Transfer of costs from General Fund to Capital. No impact on the PSED.
- R&E A2 Brent Transport Service
Review of commercial aspects of the service to identify operational efficiencies. A full Equality Analysis was requested for this proposal.

The proposed savings look to generate income for the council, or have other positive impacts on service users. Few proposals were identified during the screening process as having an anticipated negative impact. Each proposal's Equality Analysis is summarised below.

CYP A3 Gordon Brown Centre

The Gordon Brown Centre is a very large, residential holiday activity centre that is owned and run by Brent Council. The proposal is for an expanded use of the centre, either supporting families with children at risk of being taken into care, providing respite or as a residential provision for Looked After Children. The intention is that these measures would realise either cost avoidance (by enabling savings to the placements budget by not needing to purchase expensive facilities outside of the borough) or additional income. The use of capital investment in previous budget years has enabled the council to take this decision.

The measures will potentially provide Looked After Children with greater sufficiency of accommodation, and enhanced support for families with children that are at risk of being taken into care. It will also ensure the ongoing viability of the centre (particularly during this period of pandemic) and will therefore safeguard the asset for use of children who have no access to the countryside due to a range of factors, including socio-economic deprivation.

An initial concern was that expanding the use of the centre might negatively affect the provision of the centre's current educational and holiday opportunities for Brent children. These concerns are fully mitigated given the sheer size of the centre, as there is ample space for the expanded usage. No negative impacts are anticipated on protected groups. The proposal is likely to bring positive impacts in terms of better placement provision and the ongoing viability of the Gordon Brown Centre, safeguarding the provision for those who need it.

CYP B1 Further integration of commissioning with health

The proposal sets out to achieve savings by delivering more efficient joint commissioning with health partners. The new North West London health planning arrangements will provide opportunities for more efficient services, both through an Integrated Care System at NW London level for commissioning, and Integrated Care Provider teams at borough-level.

Contracts in scope are those that provide services for the council and/ or Clinical Commissioning Group across the 0-25 age range. This includes therapies (e.g. speech and language therapy; occupational therapy), mental health and wellbeing services, health services for Looked After Children, complex care packages and services commissioned to ensure school readiness. The aim is to realise savings by delivering more efficient pathways for service users.

As with any review of commissioned services, there could be a redesign of statutory and non-statutory services. This will be informed by feedback from service users and demand analysis for each service. Engagement would be undertaken with stakeholders and service users at the point of recommissioning any service. All commissioned services are subject to contract monitoring and evaluation. This includes regular feedback from service users, monitoring complaints and compliments, service data analysis and contract monitoring meetings. Detailed Equality Analyses will be completed at the time of reviewing potential changes to any service within the scope of the proposal.

Negative impacts are not anticipated, nor will services aimed at supporting vulnerable children (e.g. mental health and wellbeing; early help) reduce in scope. Efficiencies will be identified in joint commissioning approaches with health partners. The focus will be to ensure that the most vulnerable children and young people and their families continue to be supported through commissioned services.

CDS A2 Review of customer front-face offer

The proposal is for a full review of the customer front-face offer in the Civic Centre to take place from autumn 2020 onwards. The intention is to retain a 4-hours-a-day, 5-day week service managed by customer services (as has been the case since July 2020).

In addition, it is proposed to establish an additional hub in the Civic Centre in line with the current five community hubs. This would enhance the support on offer at the Civic Centre to our most vulnerable residents.

Analysis has been conducted to understand customer demand, make-up and behaviour. In recent months due to the Covid 19-lockdown and closures, customers have shifted towards using the telephone and on-line tools to access council services.

Service provision since the start of the pandemic has demonstrated that residents can complete more transactions via the website and/or telephone. This is not universal – older people are less likely to be confident in using digital service facilities. People with learning disabilities and people living with mental health issues may find it more difficult to use the digital service and require assistance or provision in another way. Users whose first language is not English may also find it more difficult to use digital self-service channels. Support will still be in place for residents to resolve queries, especially for the most vulnerable – including access to self-service, training and assistance. Indeed the new Civic Centre hub will provide additional support for those requiring our help. This additional hub will likely have a positive impact in terms of equality of opportunities across key protected characteristics.

Key consultation will take place in the spring, and a further EA will be undertaken in relation to proposal as the new offer is developed.

R&E A2 Brent transport service

The proposal is to relocate parking provision of buses for Special Educational Needs (SEN) children from Harrow to Brent in order to shorten routes and reduce driving times, and therefore create efficiency savings. It is believed that efficiencies can be made on certain routes. The proposal would affect SEN children who currently use the service. Equality monitoring information will be reviewed for passengers affected.

Only routes that provide operational efficiencies and a saving are being considered for relocation. Part of the mitigation will be to ensure that users are involved in the consultation can continue to receive a good service.

The proposal is likely to have short-term negative impacts in terms of the 'disability' and 'age' protected groups, as SEN children are likely to be affected by changes to individual routines, which can cause anxiety. The monitoring information for affected passengers will enable fuller understanding of this and the implementation of mitigating action.

Carers, whilst not protected themselves under the Equality Act 2010, are protected from indirect discrimination if they are caring for someone with a disability. Parent carers of SEN children are also likely to be affected by this proposal as their children would be affected. However in the long-term it is believed that there will be a positive impact for these groups due to shorter journey times and therefore better comfort for passengers. Negative impacts from the changing of routines in the short-term are likely to be mitigated by the long-term outcome of reducing journey times.

Passengers would be consulted on the proposed changes early in 2021 and the proposal is subject to the consultation findings. The consultation would be promoted amongst all stakeholders, including service users and their families. Any changes would be communicated sensitively, thoroughly and in advance to minimise any anxiety caused to passengers. In accordance with the NHS Accessible Information Standard, information would be communicated in a simple and clear way, for example using Easy Read, to ensure that the information and communication needs of passengers affected with a disability are met. Equality analysis would continue to be conducted and reviewed, and any impacts monitored and mitigated against where applicable. Equality monitoring information will continue to be reviewed for passengers affected.

Increase in Council Tax by 4.99% in 2021/22

In order to deliver a legally-required balanced budget, it is proposed to increase Council Tax by 4.99% (where 3% is ring-fenced for adult social care, and 1.99% is a general increase). This is the maximum increase allowed by Government. This will generate an additional

£6.5m of recurring income for the council and avoid further savings having to be made to key council services. It will mean an increase of £3.9m for the Adult Social Care budget, enabling the service to meet increasing demand of current and future service users who are amongst the most vulnerable in the community. This is a positive impact.

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

In terms of mitigation, the Council Tax Support (CTS) scheme provides some assistance for vulnerable residents and households on low incomes. Currently, approximately 22%, 27,644, 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, for those households where there is one eligible adult resident or less (36,063 households), a reduction of up to 50% on their bill will be due.

Further mitigating actions include staff training to equip officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed, and opportunities to improve equality monitoring data. The impacts of the scheme on claimants are being closely monitored. The CTS 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.

The impact of the council tax increase would be reviewed alongside the implementation of the new council tax support scheme. The existing powers under Section 13A of the Local Government Act 1992 also allow the Council to reduce Council Tax by up to 100%. The process for applying is detailed on the council's website.

5 SOCIO-ECONOMIC IMPLICATIONS

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

The proposal regarding increasing council tax has the potential to negatively impact on families and residents from lower socio-economic groups. This will be mitigated through the Council Tax Support scheme (CTS), through early and accessible communication with residents affected, and more effective working with partners to ensure resources are used effectively.

Some of the proposals will be mitigated by early and accessible communication with residents affected, continuing to offer support for vulnerable residents who are not online, for example through the Brent Hubs and digital assistance, and more effective working with partners to ensure resources are used effectively.

6 STAFFING IMPLICATIONS

Of the 16 budget proposals that were subject to an equality screening, four have staffing implications arising from staff restructures or service redesign. Where there are staffing implications for a third party, the council will work with the third party organisation to ensure that the equality implications are understood and appropriate steps taken to minimise any adverse impacts.

To mitigate against compulsory staff redundancies, two proposals will achieve a reduction through giving up vacant posts or through natural turnover. In these cases, it is considered that there will be no impact on characteristic groups. The recent Voluntary Redundancy exercise undertaken by the council has also mitigated against compulsory redundancies.

Whenever the council is required to undertake compulsory redundancies, full EAs will be undertaken as part of the consultation process.