

Overview and Scrutiny



Safer Stronger Communities Select Committee

How Lewisham Council embeds Equalities across its service provision

September 2020



**Membership of the Safer Stronger Communities Select Committee
in 2019/20:**

Councillor Juliet Campbell (Chair)

Councillor James Rathbone (Vice-Chair)

Councillor Liam Curran

Councillor Sophie Davis

Councillor Carl Handley

Councillor Jim Mallory

Councillor Lionel Openshaw

Councillor Stephen Penfold

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Councillor Jim Mallory

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Introduction by Councillor Juliet Campbell

The London Borough of Lewisham has long celebrated its diversity and strong commitment to community development and cohesion. As a borough, Lewisham has always recognised the importance of being inclusive in its diversity and is determined to build on this 'the Lewisham Way' to ensure that our residents' voices are heard and to strive to be a place where people feel safe and valued.



I write this introduction as we are living through a global pandemic, Covid-19. Its impact on specific communities has laid bare deep inequalities in the UK "it has held up a mirror to society." It has shone a light on the hidden inequalities, hidden poverty and hidden discrimination against groups of people. This crisis should be the moment when we ensure that what comes next, is better.

The Committee recognises that there is no quick fix to the challenges ahead, however, the recommendations in this report attempt to address some of themes which arose when we were collecting evidence. The recommendations aim to shape and inform the Council's policies and practice because as we are aware many of these inequalities are preventable and avoidable.

It is my hope that this report supports the Council to build a sustainable and fair Lewisham, where communities work to support each other and continue to show the extraordinary resilience and courage shown during the early months of this year. It was then, that the third sector, communities and individuals were empowered to lead and serve, during the crisis.

I would like to take this opportunity to thank all the organisations and individuals that have contributed to this report. A special thank you and appreciation to Vice Chair, Councillor James Rathbone and Katie Wood, Scrutiny Manager that have worked hard to shape the report. Also special thank you to colleagues at Glasgow City Council for their support.

Finally, I would like to remember Paulette Wilson, a prominent Windrush campaigner, without whom, the Windrush scandal may have remained hidden, who sadly died on 23rd July 2020.

Councillor Juliet Campbell

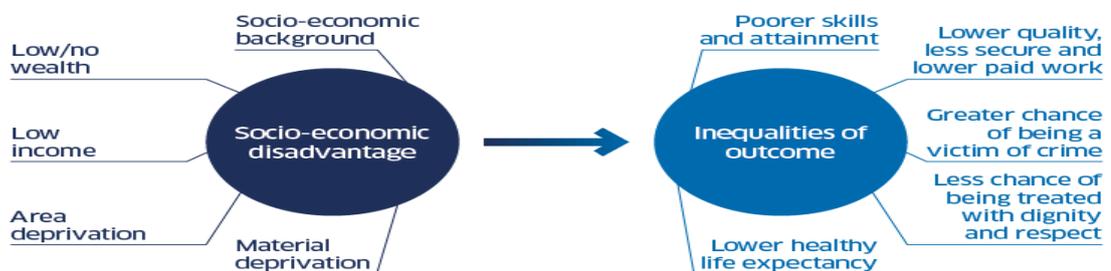
Chair Safer & Stronger Communities Select Committee

Executive summary

This review looks at the current ways equalities are considered in Lewisham Council. In particular it considers: how the Council is meeting its equality obligations under the Equality Act 2010 and Public Sector Equality Duty; how consideration of equalities is embedded across the council; and workforce equalities. The review also considers socio-economic equality.

The Committee had a strong focus on ensuring that the diverse needs of Lewisham residents were understood and supported and this was the starting point for the review. The evidence gathered was considered by the committee through the angle of how the council can best serve all Lewisham residents. It links strongly with the Corporate Priority of “Open Lewisham” and includes themes on open data and on engagement that fit with the recommendations by the Council’s Democracy Review.

From the start of the evidence gathering, Part 1 of the Equality Act 2010 and socio-economic inequality more generally were key lines of enquiry for the Committee. The Fairer Scotland Duty which enacts Part 1 of the Equality Act had recently come into force in Scotland and therefore evidence from Glasgow City Council was a key area of research, and many of the Committee’s recommendations have a strong link to the evidence gathered here. The Fairer Scotland Duty requires public authorities to actively consider how they can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions. The review showed that socio-economic disadvantage included a range of factors that led to inequalities of outcome.



The evidence gathered also highlighted the importance of intersectionality not just between the Equality Act protected characteristics but also with socio-economic disadvantage. Fully understanding the effect of policies and actions on individuals’ outcomes needed consideration of all these factors together to get a true understanding.

During the evidence the Committee received and noted many good examples of equalities work being undertaken at Lewisham Council. However, they felt that the evidence received from other local authorities, from the LGA and from community groups showed that more could be done, in particular, to fully embed good practice across the whole of the organisation through robust systems and through ensuring the quality and availability of data.

The review is indebted to all the organisations and individuals who gave evidence to help shape the Committee’s recommendations.

Recommendations

The Committee wishes to make the following recommendations:

1. A Fairer Lewisham Duty should be established requiring the Council to consider socio-economic disadvantage in its decision making process.
 - a. All Equality Impact Assessments should consider socio-economic disadvantage on the same basis as the nine statutorily protected characteristics.
 - b. Lewisham Council should produce clear guidance for staff, Councillors, partner organisations and the public, explaining the Fairer Lewisham Duty, with reference to the Interim Guidance for Public Bodies produced by the Scottish Government.
2. Intersectionality should be considered as part of the Equalities process.
 - a. Each department and all project leads should consider issues of intersectionality, and a range of diverse groups and their needs.
 - b. The Council should listen to, include, and meaningfully collaborate with diverse groups. There should be diversity of individuals and diversity of organisations. One voice cannot speak for all.
 - c. In funding, designing and commissioning services the Council should take an intersectional approach. This could include;
 - i. Ensuring diverse organisations closest to the ground take the lead in project design and implementation.
 - ii. Recognise and trust the expertise and lived experiences of organisations and movements, especially those representing marginalised groups.
 - iii. Funding diverse organisations and movements to facilitate safe spaces where particularly marginalised communities can feel empowered to speak freely.
 - d. The Council should build a senior management team with a culture of inclusion that reflects the diversity of communities and overlapping identities in Lewisham.
 - e. The Council should create a culture that celebrates difference by appreciating the contributions that everyone can make.

3. **A more proactive approach should be taken to address the Public Sector Equality Duty.**
 - a. Equality objectives should be specific, achievable and measurable.
 - b. Equality objectives should be readily understandable to the public.
 - c. Equality objectives should identify areas of work via which improvements in equality can be made.
 - d. Progress in these areas of work should be monitored and reported.
4. **Staff Diversity Forums should be empowered within the Council.**
 - a. Forums should have a clear remit as to their purpose and how they contribute to the improvement of the Council.
 - b. Forums should have a set time to meet to discuss, promote and air concerns staff may have affecting equality in the Council. This should be adequately resourced and supported by the Council.
 - c. Forum leads should be given specific time away from their substantive role to plan, prepare and carry out the forums activities. This should be protected time which will not impact on their hours of work.
 - d. Forum members should be given time to participate in its activities.
 - e. Forums should be given the opportunity to meet with senior management and communicate the experiences and needs of staff.
5. **The Council should adopt an Open Data approach for Equalities.**
 - a. Data sharing across the organisation should be improved. It should not be a challenge to access data that has already been collated by different teams or departments.
 - b. Guidance for producing Equality Impact Assessments (EIA) should be clear. Equality Impact Assessments should be data driven.
 - c. Every Equality Impact Assessment should be logged by Corporate Services and published on the Council website making it accessible to all.
 - d. Steps should be made to ensure individuals are confident sharing their data with the Council to help improve services. At the point where individuals share their data agreements should be in place to allow for this to be anonymised and shared where necessary.

3. Purpose and structure of review

- 3.1 At their meeting on 30th April 2019, The Safer Stronger Communities Select Committee decided to undertake a review into “How the Council embeds Equalities across its service provision.”
- 3.2 The Committee agreed the scope to the review at their meeting on 16th July 2019. The following key lines of enquiry were agreed:

Equalities in Lewisham

1. How is Lewisham Council meeting its equalities obligations under the 2010 Equality Act and Public Sector Equality Duty?
2. What is the Council’s Comprehensive Equalities Scheme and how successfully is it embedded in decision-making and policy and strategy development?
3. How else is equalities embedded across the Council including Equality Analysis Assessments and Equalities implications in Committee reports?
4. What is the importance of socio-economic inequality and income deprivation? How can the Council promote socio-economic equality?
5. How does the Council ensure equalities are embedded in the commissioning process for third party organisations that deliver services?
6. What can we learn from the work of partner organisations such as Metro (commissioned by Lewisham to provide a strategic equalities lead)? Are Lewisham residents’ equalities needs known and taken into account? Do gaps exist?

Employee Profile and Staff Survey Results

1. Is the Council meeting equalities obligations as an employer?
2. What do the staff survey results tell us?
3. Are staff engaged and treated fairly?
4. Are there any barriers for staff?
5. Are different groups and those with protected characteristics represented at all levels in the organisation?
6. Are there any causes for concern – dissatisfaction/grievances/high turn-over?
7. Does the employee profile reflect the community Lewisham serves?

Best Practice on Equalities and on Socio-economic deprivation

1. What are the best performing local authorities and government organisations doing?
2. How can local authorities take socio-economic factors into account in terms of promoting equality? (Consider the indices of Multiple Deprivation data release and evidence from Scotland on the Fairer Scotland Duty).
3. Are there any examples of good community engagement strategies that the Council could learn from?

3.4 The timeline of the review was as follows:

Scope Agreed and First Evidence Session – 16 July 2019

- Evidence from Lewisham Council's Head of HR and Occupational Development and representatives from employee unions invited.

Meeting with Metro Charity – 17 September 2019

Indices of Deprivation Workshop – 29 October 2019

- As part of the evidence gathering for the review, Members were invited to attend a workshop on the new release of the indices of deprivation.

Lewisham Council Equalities Forum – 29 October 2019

- The Scrutiny Manager attended this meeting to introduce the Committee's review and invite submissions from community groups involved.

Second Evidence Session – 9 October 2019

- The Committee heard evidence from Naomi Goldberg, Director of Strategy at Metro Charity; Paul Aladenika, Service Manager – Policy Development and Analytical Insight, LB Lewisham; and Katharine Nidd, Strategic Procurement and Commercial Services Manager, LB Lewisham.

Visit to the London Borough of Sutton – 4 November 2019

- The Chair, Vice-chair and Scrutiny Manager met with Alison Navarro, Chief Executive, Community Action Sutton and Chair of the Sutton Fairness Commission and with Simon Breeze, Policy and Projects Manager, LB Sutton.

Interfaith Forum – 18 November 2019

- The Scrutiny Manager attended this meeting as part of the evidence gathering for the review.

Third Evidence Session – 26 November 2019

- The Committee heard evidence from Tom Brown, Executive Director for Community Services and received a written submission from Metro Charity.

Young Advisors Engagement – 9 December 2019

- The Committee commissioned an engagement session with the Lewisham Young Mayor Advisors group. The session was led by Jacob Sakil, Young Mayor Advisor Team with the Committee's Scrutiny Manager.

Forth Evidence Session – 16 January 2019

- Evidence commissioned and received from the Local Government Association
- Written Submission received from the Interfaith Forum

Commissioning and Procurement Process Equalities walk through – 30 January 2020

- The Committee requested a presentation and question and answer session based on commissioning and procurement exercises that had taken place at Lewisham Council. The Chair and Vice-Chair attended with the Scrutiny Manager.

Visit to Glasgow City Council – 4 February 2019

- The Chair, Vice-Chair and Scrutiny Manager visited Glasgow City Council to learn from their work on equalities. Meetings were held with a range of people including Cllr Layden, City Convenor for Equality and Human Rights.

Equalities Analysis Assessments walk through – 6 February 2020

- Members of the Committee were requested a workshop be organised as part of the evidence looking at Equality Impact Assessments in Lewisham. Cllr Juliet Campbell, Committee Chair attended with the Committee Scrutiny Manager.

Reports to Safer Stronger Communities Select Committee – 4 March 2020

- The Lewisham Disabled People's Commission – presentation from Jamie Hale, Chair of the Commission
- Report on the Council's new Single Equalities Framework 2020-24

Recommendations and final report – (9 September 2020)

- The delay between the last of the Committee's evidence gathering in March 2020 and the draft report being presented to Committee in September 2020 is due to normal scrutiny arrangements being suspended between late March 2020 to September 2020 as part of the Council's emergency response to the Covid 19 pandemic.

Structure of the Review

- 3.5 This report has structured the evidence in the following way: Section 4 will give the policy context and background. Section 5 will focus on addressing the questions on equalities in Lewisham as highlighted in the scope and in questions 1-6 in the first section of paragraph 3.2 above. Section 6 will look at the employee profile and questions 1-7 in the second section of paragraph 3.2 above, and section 7 will examine examples of best practice (questions 1-3 in the third section of paragraph 3.2 above), including looking in more depth at socio-economic deprivation as carried out by the Committee's research and investigative visits and requests for evidence. This will include a strong focus on the work of Glasgow City Council. Section 8 will include information from the consultations carried out by the Committee as part of the review and submissions from local partners in the borough on their concerns and on good practice.

4 Policy Context and Background

- 4.1 The Council's new Corporate Strategy 2018-22 sets out 7 corporate priorities that drive decision making in the Council. Lewisham's corporate priorities have been agreed by full Council and they are the principal mechanism through which the Council's performance is reported.
- 4.2 The Council's Corporate Strategy of "Open Lewisham" promotes Lewisham as a welcoming place of safety for all which celebrates the diversity that strengthens us. It includes emphasis on Lewisham being a place where diversity and cultural heritage are recognised as a strength and celebrated and where hate crime will not be tolerated.
- 4.3 The strategy includes specific references to striving to make the Council's workforce more representative of the borough's diverse population at all levels and to challenging all forms of discrimination and tackling unconscious bias. There is also reference to understanding and mitigating the impact of Brexit for the borough.
- 4.4 Lewisham has an estimated population of around 303,000 residents, approximately 25% of which are children aged 0-18. Approximately 10% of residents are aged over 65. Approximately 54 per cent of the population is white, whilst 46 per cent is from a Black, Asian or Minority Ethnic background. Some 15 per cent of Lewisham residents describe themselves as disabled and about a third describe themselves as having a faith. Estimates vary on the proportion of the population who identify as LGBT with a range between 4% to 8%.
- 4.5 Nearly one in four residents are earning below the London Living Wage and there are just over one in ten households in which no-one has ever worked. Nationally, Lewisham ranks 63rd most deprived local authority out of 326 local authorities on the IMD 2019, with respect to income deprivation affecting both children and adults and 99th out of 326 against the measure of employment deprivation.¹

Equality Act 2010 and Public Sector Equalities Duty (PSED)

- 4.1 The Equality Act 2010 came into force in October 2010 and replaced previous anti-discrimination laws with a single Act. Before the Act came into force there were a number of pieces of legislation to cover discrimination, including:
- The Equal Pay Act 1970
 - the Sex Discrimination Act 1975
 - the Race Relations Act 1976
 - the Disability Discrimination Act 1995
 - the Employment Equality (Religion or Belief) Regulations 2003
 - the Employment Equality (Sexual Orientation) Regulations 2003

¹ Local Authority District Summary, English Indices of Deprivation 2019
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

- the Employment Equality (Age) Regulations 2006
- the Equality Act 2006, Part 2
- the Equality Act (Sexual Orientation) Regulations 2007²

4.2 The Act brings together this previous legislation into one Act which is a legal framework to protect the rights of individuals and advance equality of opportunity for all. Within the Act there are nine protected characteristics of:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.
- marriage or civil partnership status

Public Sector Equality Duty (PSED)

4.3 One of the main parts of the Equalities Act in terms of the duties of local authorities is the Public Sector Equality Duty under Section 149 of the Equality Act 2010. This says that public authorities must, in the exercise of their functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Socio-Economic Inequalities

4.4 Part 1 of the Equality Act 2010 is entitled Socio-Economic Inequalities and it requires relevant authorities to: “when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.”

4.5 When the Equality Act came into force, part 1 was applicable only to a limited number of public bodies. However there has been some prominent advocates of this duty being applied to a wider range of public organisations including local authorities.

² EHRC, Introduction to the Equality Act, <https://www.equalityhumanrights.com/en/equality-act-2010/what-equality-act>

4.6 The Equalities and Human Rights Commission published a report entitled “Progress on Socio-Economic Rights in Britain” in which they recommended the Government:

“Implements the duty on public authorities to take account of the impact of their decisions on socio-economic inequalities under Part 1 of the Equality Act 2010 in England and Wales.”³

4.7 In addition to this, the United Nations Committee on Economic, Social and Cultural Rights published in 2016 an enquiry into the UK and Northern Ireland in which they recommended:

“that the State party bring into force the relevant provisions of the Equality Act that refer to the public authorities’ duty on socio-economic disadvantage, as well as to the prohibition of intersectional discrimination, in order to enhance and guarantee full and effective protection against discrimination in the enjoyment of economic, social and cultural rights.”⁴

4.8 In Scotland the Fairer Scotland Duty came into force in April 2018 meaning part 1 of the 2010 Equality Act will now apply and public authorities in Scotland will now have a legal responsibility to actively consider (‘pay due regard’ to) how they can reduce inequalities of outcome caused by socioeconomic disadvantage, when making strategic decisions. There is also discussion in Wales with a joint report by two of the committees of the National Assembly for Wales recommended in October 2018 that the Welsh Government should “outline its latest position on the introduction of the socio-economic duty, given that the power to do so will be devolved under the new settlement.”⁵ Socio-Economic inequalities are a key theme within Lewisham Council’s new corporate strategy.



Scotland Duty: Interim Guidance for Public Bodies⁶

³ EHRC Progress on Socio-Economic Rights in Britain, March 2018 <https://www.equalityhumanrights.com/sites/default/files/progress-on-socio-economic-rights-in-great-britain.pdf>

⁴ UN Economic and Social Council “Concluding observations on the sixth periodic report of the United Kingdom of Great Britain and Northern Ireland” 14 July 2016 <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=4slQ6QSmIBEDzFEovLCuW3XRinAE8KCBFqOHNz%2FvuCC%2BTxEKAI18bzE0UfQhJkxxOSGuoMUxHGypYLjNFkwxnMR6GmqogLJF8BzscMe9zpGfTXBkZ4pEaigi44xqil>

⁵ National Assembly for Wales, “Equalities and Brexit” Joint findings by the Equality, Local Government and Communities Committee and the External Affairs and Additional Legislation Committee, October 2018 <http://www.assembly.wales/laid%20documents/cr-ld11793/cr-ld11793-e.pdf>

⁶ The Fairer Scotland Duty, Interim Guidance for Public Bodies, Scottish Government, March 2018 <https://www.gov.scot/publications/fairer-scotland-duty-interim-guidance-public-bodies/>

5 Equalities in Lewisham:

The Comprehensive Equalities Scheme and Single Equalities Framework

5.1 At the time of the Committee's evidence gathering, The Council's Comprehensive Equality Scheme (CES) was the Council's framework through which policy development and service delivery was developed and viewed. It incorporated the Council's five equality objectives.

- **tackle** victimisation, discrimination and harassment
- **improve** access to services
- **close** the gap in outcomes for all residents
- **increase** mutual understanding and respect within and between communities
- **increase** citizen participation and engagement

5.2 The CES had a specific focus on the development of strategies and plans as this is where resources and effort to facilitate delivery of services is targeted.

5.3 During the 2019-20 municipal year, the Council started developing a new Single Equalities Framework (SEF) for 2020-24. Comments and recommendations from the Committee's evidence sessions as part of this review were taken into account when drawing up the new framework. This included the proposal that the overarching theme of the SEF 2020-24 would be 'social mobility'. The theme underpins the wider work that the Council undertakes in terms of promoting the social, economic and environmental well-being of Lewisham residents. The Committee heard that through the SEF, the intention was to make the ambition of 'social mobility' more explicit.

Data Gathering

5.4 A review of the Council's approach to equality data monitoring is currently underway. The broader aim of the data monitoring review is to enhance the organisation's capacity for evidence-based decision-making. The review recognises that the equalities landscape is changing and that residents and service users may have a number of characteristics and experiences. It is therefore felt that an enhanced approach to equality data monitoring will improve the way in which the Council designs and delivers services.

BAME equalities report

5.5 The Council is reviewing BAME equalities and will be producing a report later this year (2020). The aim of the review is to capture and analyse data relevant to the experience of the BAME community in Lewisham. Insights gained from the analysis will then be used to inform policy and service responses. Initially the proposal is that the report will be published annually. Areas to be covered by the report include the following:

- demography
- housing
- health
- education
- employment

Corporate Equalities Policy

- 5.6 The Council's Corporate Equalities Policy⁷ is the Council's guide to monitoring, analysing and promoting equality in Lewisham. The policy provides a guide to equalities monitoring, collecting data and to completing Equality Analysis Assessments. The Policy is being reviewed and will use the findings and recommendation of Safer Stronger Communities Select Committee's review to shape the new policy.

The Council Directorates:

- 5.7 Safer Stronger Communities Select Committee requested that each Executive Director produce a summary highlighting the key equalities issues facing their Directorate over the next few years, for this review. Each of the summaries are included in their entirety at Appendix 1 of this report.
- 5.8 Across all four directorates key themes emerged in terms of the challenges faced, including: understanding and adapting to demographic change; adapting to the reduction in public spending and budget cuts; the challenges faced by Brexit; and data capturing and the availability of data. Socio-economic equality including income deprivation and income deprivation affecting children was also a key theme, together with an acknowledgment that this has not always been fully understood due to gaps in the available data. The summaries also point to budget cuts and public spending reduction disproportionately affecting the most disadvantaged. Supporting and better understanding the data and needs of residents with multiple characteristics (intersectionality) is also a theme across all directorates as well as improving Equality Analysis Assessments. Each directorate has specific focuses within these areas that are listed in full at Appendix 1. The evidence for this review was gathered and concluded prior to the Covid-19 pandemic which is why this is not included as part of the themes. The Committee recognises that Covid-19 both during the pandemic and after in the recovery period will now be a key area in every directorate. The Committee also recognises that the Council's structure has recently changed but notes that the key themes will still be relevant.
- 5.9 Key areas for Customer Services include: affordable housing and meeting the needs of vulnerable groups; the Syrian refugee programme; monitoring the

⁷ Lewisham Council Corporate Equalities Policy, accessed May 2019.
https://lewishamcouncil.sharepoint.com/:w:/r/sites/Intranet/_layouts/15/Doc.aspx?sourcedoc=%7B6E8D9E21-A038-4EA1-AEC2-E1882F54E8E8%7D&file=CorporateEqualityPolicy.docx&action=default&mobileredirect=true&DefaultItemOpen=1

risk of EU Nationals having “No recourse to public funds” if there are challenges to settling their immigration status; and monitoring intersectionality (those who have more than one protected characteristic or need) through software to predict growth and improve timeliness for intervention.

- 5.10 Children and Young People Directorate key areas include: the increase in demand for SEND provision and rise in numbers of children with Education and Healthcare Plans (EHCPs); access to mental health services in particular for the most socio-economically disadvantaged and for BAME young people; improving school attainment in particular for Black Caribbean children and White children on free school meals; reducing exclusions and in particular the over-representation of Black Caribbean pupils. Increasing the representation of BAME people in senior management in schools and on governing boards was highlighted along with data gathering from externally commissioned services. Other areas included childhood obesity and the disproportionate effect on socio-economic disadvantaged BAME communities as well as ensuring disadvantaged 2 year olds had access to free early years provision were all highlighted as key issues facing the directorate from an equalities point of view.
- 5.11 Community Services has a strong emphasis on supporting vulnerable adults through Adult Social Care provision. They have emphasised that the support is broader than the Equalities Act and is about promoting the right to live independently. Again there is an emphasis on socio-economic status and that this is neglected in the Equalities Act. Similarly to other Directorates the challenges of ensuring the robustness of Equality Analysis Assessments is also raised. There has been a strong emphasis on unconscious bias and disproportionality particularly within the criminal justice system. The summary also acknowledges that “the Directorate can sometimes struggle to fully understand where its role begins and ends in terms of addressing wider issues of inequality/disproportionality particular in times where budgets are very tight and the need to maintain a core service offer is the primary consideration.”

Evidence at Committee

- 5.12 The Committee requested evidence from the Council on the current position in Lewisham in relation to the embedding of equalities across the organisation, based on the Committee’s questions from their scoping document. This was addressed through a report to Committee on 9th October 2019 prepared by Paul Aladenika, Service Manager – Policy Development and Analytical Insight, LB Lewisham and Katharine Nidd, Strategic Procurement and Commercial Services Manager. The discussion and questions that this report initiated also helped the Committee address these themes. The following paragraphs 5.13 – 5.44 provide evidence as submitted in the Council report to Committee⁸. The key points of the Committee’s discussions around this evidence are summarised afterwards at paragraphs 5.44.

⁸ Safer Stronger Communities Select Committee –reports to Committee – 9th October 2020
<http://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=189&MId=5529&Ver=4>

How is Lewisham Council meeting its equalities obligations under the Equality Act 2010 and Public Sector Equality Duty?

- 5.13 *The Public Sector Equality Duty is a duty under the Equality Act 2010. It requires public bodies in the exercise of their functions to have due regard to the need to eliminate discrimination between those with a 'protected characteristic' (as defined by the Act) and other people, to advance equality of opportunity between those with and without a protected characteristic, and to foster good relations between different people when carrying out their activities.*
- 5.14 *The provisions of the Duty do not preclude public bodies from making decisions that could adversely impact groups of individuals who have a protected characteristic nor, in limited circumstances, from making decisions to reduce disadvantage by taking positive action in relation to a protected group. However, public bodies must demonstrate that they have taken reasonable steps to acquire relevant information and weigh up relevant factors before reaching decisions. In the event that impacts of decisions are likely to be negative, where possible, public bodies should describe actions that will be taken or have been considered to moderate those impacts on protected groups.*
- 5.15 *Where major changes to policy, strategy and service delivery are required or where major budget decisions are being made, it is expected that officers undertake equality analysis assessments to model the likely impact of such changes on residents and service users. The above assessments will demonstrate how evidence has been weighed and how various factors considered in the development of recommendations for decision-making.*
- 5.16 *In policy terms the Council has also sought to embrace a wide definition of equality. This definition recognises the needs and aspirations of groups such as refugees, asylum seekers, those who do not speak English as a first Language and European Union nationals living in the borough, who face specific challenges as a result of Brexit. The point being made here is the Council has taken active steps to adopt an approach to equality that measures success in terms of its commitment to public welfare, rather than simple compliance with statute.*
- 5.17 *With regard to the above, the main challenge for the Council has been the need to ensure that it has access to data across the range of equality groups. This continues to be a challenge for some protected characteristics where the availability of data relies upon self-declaration and the issue of discrimination is a barrier for such declarations to be made in the first place.*
- 5.18 *Part of the challenge that the Council faces with regard to gathering diversity data, is that there must always be a clear business case for it and once collected, it must be used for the purpose for which it was collected in the first place. The Council's approach to data collection must always be proportionate. Therefore, diversity data is not collected as a default.*

- 5.19 *There is also the matter of personal choice. Residents and services users are not mandated to share their personal information with the local authority. That said, it is recognised that the Council could and should do more to encourage residents to share such information. In particular, by demonstrating much more clearly how diversity information has been used in the past, to improve services.*
- 5.20 *The desire to ensure that the above process is managed as effectively as possible has led the Executive Management Team to ask Directorate Management Teams to play a much greater role in providing assurance across their areas of responsibility. As part of this directorates are taking a strategic view of data gathering based on an assessment of longer term issues and challenges. This will help ensure that the approach to data collection is not just operationally driven.*

What is the Council's Comprehensive Equalities Scheme and how successfully is it embedded in decision-making and policy and strategy development?

- 5.21 *The Comprehensive Equalities Scheme is an assurance framework for evaluating and assessing how the Council addresses and promotes equality and fairness through the performance of functions and the provision of services. The existing Comprehensive Equalities Scheme is comprised of the following five objectives:*
- *Tackle, victimisation, discrimination and harassment*
 - *Improve access to services*
 - *Close the gap in outcomes for our citizens*
 - *Increase mutual understanding and respect, within and between communities*
 - *Increase participation and engagement*
- 5.22 *The above-mentioned objectives are the prism, through which officers and members can assess the rationale and impact of recommendations as they are being developed and before they are agreed. By applying this lens, the Council is better able to understand the impact that its decisions might have on service users and where possible, take reasonable steps to mitigate any negative impacts.*
- 5.23 *The Comprehensive Equalities Scheme is not a strategy. As such, it does not set strategic goals, nor is it accompanied by an action plan and resources to effect delivery. The idea is that the underpinning objectives of the Scheme should instead be reflected in the strategies, plans and business systems through which the Council delivers and where resources are already invested.*
- 5.24 *The rationale for a strategic framework for equalities rather than a strategy is based on the presumption that it is a much more effective way to ensure that all Council business systems and processes have equalities at their core. This would not be the case if equalities consideration were an adjunct sitting in a*

separate plan – or for that matter in nine separate plans reflecting each of the nine characteristics protected under the Equality Act.

- 5.25 *It is because the Comprehensive Equalities Scheme is a strategic framework and not a strategy that its impact is measured in terms of business assurance and confidence, rather than targets achieved or deadlines met. A particular measure of business assurance is the extent to which, when scrutinising information presented by officers, elected members can satisfy themselves that consideration of equality objectives have been factored into relevant impact assessments and report recommendations.*
- 5.26 *A good recent example of how the Comprehensive Equalities Scheme framework has been applied is with respect to the development of the Children and Young People’s Plan 2019-22. The Plan addresses all five Comprehensive Equalities Scheme objectives and reflects these in its ambition, intent and success measures. The Plan was adopted by Full Council in July 2019.*
- 5.27 *Another strategy, in development, that will incorporate the above approach is the Council’s Housing Supply Strategy. The Strategy will be using equality data as a lens to inform how the Council builds, buys and acquires properties as well as what partners build and develop in the borough.*
- 5.28 *As elsewhere, there is more that can and should be done to improve the effectiveness of the above approach. Specifically, the systematic and routine application of the Comprehensive Equalities Scheme, as an assurance framework, is not yet custom and practice across the organisation.*

How else is equalities embedded across the Council including Equality Analysis Assessments and Equalities implications in Committee reports?

- 5.29 *There are a wide range of ways in which equalities is embedded across Council business systems. Set out below, are some examples of this.*
- Strategy development – various strategies reflect the Council’s broader commitment to equality and to the needs of various protected characteristics. Examples of these include: the Corporate Strategy, Safer Lewisham Plan, Children and Young People’s Plan, Mental Health and Well-being Strategy and Housing Strategy;*
 - Strategic needs analyses – the Council publishes various strategic needs analyses which are used to inform strategic planning, funding bids and service planning. Joint Strategic Needs Assessments (JSNAs) that have been published in the last 18 months include those on ‘parenting’ and ‘maternal mental health’. JSNAs that are scheduled for publication in the next twelve months include those for ‘LGBT+ health’, ‘children and young people self-harm’ and ‘transitions preparing for adulthood’;*

- *Service planning process – guidance published each year requires directorates to ensure that equality objectives and priorities are incorporated in service planning. This is to help ensure that service plans are effective delivery vehicles for equality objectives;*
- *Public consultation and engagement - some 50 public consultations are undertaken each year. As part of this, the Council invites survey respondents to complete a diversity questionnaire. The purpose of the questionnaire is to better understand who is responding to surveys and how representative survey responses are;*
- *Budget savings – each year the Council undertakes a budget savings process. As part of this, officers are required to assess the likely impact of savings proposals for all protected characteristics (where such impacts are known or anticipated). Analysis of this assessment is presented for members' scrutiny and published as part of the Budget Report;*
- *Performance reporting – performance reports across the Council demonstrate how equalities is embedded. Reports include data relevant to a number of protected characteristics including age, gender, disability and race;*
- *Service eligibility assessments – services such as housing, children's and adults social care undertake standard statutory assessments which provide a rich source of equalities data regarding those eligible to access their services;*
- *Service design – the Council designs services in a way that is responsive to the needs of specific communities and groups in the borough. An example of how this works is being undertaken for the LGBT+ community and is set out in the response to the In-depth Review of Services to the LGBT+ Community;*
- *Training – the Director of Law has delivered Equality Act training for Executive Directors and Service Directors. The purpose of the training is to ensure that senior Council managers are fully conversant with their roles and responsibilities as it relates to the legislation. Other training which is being commissioned by the Council includes that for 'Unconscious Bias'.*
- *Committee reports - Where reports are prepared for decision making by Committee – for example, Mayor and Cabinet – or by other decision makers, equalities issues will be considered. There is a section in reports for the insertion of consideration of the equalities implications of the decision, and the legal implications section of the report will include information for the decision maker about the legal issues involved.*

5.31 It is important to note that the above list is by no means exhaustive. However, it is intended to provide reassurance to members that the Council undertakes a wide range of work to assure itself that statutory and policy obligations regarding equality are being met. That said, it is recognised that more can be done to ensure that as well as being embedded in policy and procedure, consideration of equalities is part of organisational custom and practice.

What is the importance of socio-economic inequality and income deprivation? How can the Council promote socio-economic equality?

- 5.32 *As set out on the Council's website, the Comprehensive Equality Scheme sets out our aspiration to take all reasonable steps to ensure that every citizen is able to do the best for themselves and for others. This will involve the promotion of social economic and environmental well-being for all. As such, an approach to equality that does not address aspirations for advancement for those on the lowest incomes and living in the most deprived communities is will fall short of the Council's best expectations for its residents.*
- 5.33 *Socio-economic status is not a 'protected characteristic' under the Equality Act. However socio-economic inequality is likely to be part of the lived experiences of a wide range of people who have a protected characteristic. For example it is likely that groups including women, lone parents with dependent children, older people, disabled residents and ethnic minorities will face specific challenges which limit their economic potential. Where that issue is a relevant consideration for a particular decision, it can therefore be taken into account.*
- 5.34 *For the Council, it is particularly important to focus on fairness and equity in the performance of roles and discharge of functions. The fact is that, whilst equality is about doing the best for everyone, fairness is about targeting those whose circumstances make them most vulnerable. As such, within the broader definition of what could be termed 'equality' it is incumbent upon the Council to ensure that it focuses effort and resources on those in the greatest need.*
- 5.35 *Examples of actions that the Council takes and should continue to take, which will have the effect of promoting socio-economic fairness include the following:*
- Increase the number of Living Wage employers in the borough and ensure that service providers contracted by the Council, pay the London Living Wage;*
 - Encourage take up of free childcare places to help parents who want to return into the labour market to be able to do so;*
 - Increase take up of apprenticeships and particularly look to support young people from the most disadvantaged backgrounds;*
 - Improve attainment at Lewisham secondary schools, but particularly for those pupils who performs least well compared to other pupils such as afro-Caribbean pupils and white pupils in receipt of free school meals;*
 - Target early help to families that might be at risk, which would help to prevent the avoidable escalation of need and the risk that children may need to be taken into care;*

- *Expand the Council's business growth programme for small businesses and support more start up business to grow and become sustainable;*
- *Continue to monitor the gender pay gap to ensure that women do not suffer pay discrimination.*

How does the Council ensure equalities are embedded in the commissioning process for third party organisations that deliver services?

- 5.36 *The Council ensures that equalities are embedded in the commissioning process at all stages and in a number of ways.*
- 5.37 *Initially equalities will be considered as part of the permission to procure reports and therefore the early scoping of what it is the Council wishes to procure and how it wants these goods, works and/or services to be delivered to assist in the achievement of the Corporate Strategy. All procurements require approval prior to commencement and the Council's Contract Procedure Rules contained within section I of the Constitution and the Schemes of Delegation clearly define the approval route for procurement of goods, works and services, depending primarily on value.*
- 5.38 *It is expected that an initial scope of services be appended to the permission report and these reports are required to follow the standard report template which includes a section which considers equalities impacts. The specification itself always clearly articulates the service need and the impact this may have on those with protected characteristics and how the goods, works, and/or services to be provided are expected to mitigate or protect these. This shapes the service itself.*
- 5.39 *Decision reports will include a 'legal implications' section which – as with other reports - will contain information for the decision maker about the legal issues involved in considering equalities issues.*
- 5.40 *Once permission to procure has been given officers work with the procurement and legal services teams to draft the tender documentation. In addition to the specification this will include the Invitation to Tender document, the Method Statements required, the draft Terms and Conditions of contract, and the Council's Sustainable Procurement Code of Practice. Within the method statement templates there is a standard method statement on equality and diversity ensuring that all procurements include an explicit question on this unless there is an agreed deviation from standard form.*
- 5.41 *Once live the third party organisations will need to respond to the tender and their approach and commitment to equality and diversity will implicitly tested through their responses on how they will provide the goods, works, and/or services and how this service delivery meet our requirements with regards to equalities.*

5.42 *As part of the tender response third party organisations will also need to agree the Council's terms and conditions for the contract. These include a requirement on contractors to comply with the Council's Sustainable Procurement Code of Practice which contains overarching obligations requiring all contractors to consider and address equalities by requiring the following:*

“Contractors, suppliers and service providers must follow best practice and comply with all legislation in relation to equality and diversity and be consistent with Lewisham's Comprehensive Equality Scheme (the Council's key equality policy document). Contractors, suppliers and service providers will provide the Council on request with copies of:

- *Instructions to those concerned with recruitment, promotion and training.*
- *Equality and diversity policies, procedures and other documents available to employees, recognised trade unions or other representative groups of employees.*
- *Recruitment advertisements or other literature.*

In order to assist the Council in its objectives under the Equalities Framework for Local Government (EFLG), contractors, suppliers and service providers must demonstrate that they have an understanding and commitment to the principles and practice of equality in the services they provide. They must also regularly review their services and access to them to ensure they continue to be appropriate and accessible to Lewisham's diverse communities.”

5.43 *Finally at the conclusion of every procurement exercise there is the requirement to obtain approval to award, and, similar to permission reports, all procurement award reports follow the standard Council template which includes a section on equalities impact. Again, all reports will include a 'legal implications' section which will contain information for the decision maker about the legal issues involved in considering equalities issues.*

Questions and challenge from Members of Safer Stronger Communities Select Committee:

5.44 Following the report and presentation, members of the Committee highlighted a number of points.

- Information challenges included: data gathering; understanding the data; and how easy to access it was. Residents did not always have to complete equalities monitoring forms so data was not always available.
- The Council could do more to demonstrate how it used the data effectively to make decisions and build trust so it was easier for service users to share the information.
- The challenge of the CES was that it needed to be used. If it was not considered at the policy or strategy development stage then there may not be the right focus on equalities.
- Regarding how equalities was embedded across the Council - an important area was strategy development. Instead of having a discreet equalities

strategy, the Committee heard that equalities were built in within other strategies such as: the Housing Strategy; the Children and Young People Plan etc.

- There were areas where improvements were needed such as the information that goes into reports and ensuring the equalities implications were complete.
- The Committee heard that although socio-economic inequality and income deprivation were not protected under the Equalities Act, the Council understood that it did affect the experiences of people with protected characteristics and those without. Where it was relevant socio-economic implications should therefore be considered and reflected. It may not always be appropriate to consider socio-economic implications but the default should be to consider and work back from there.
- Regarding equalities implications in reports – these should be clearly highlighted in the reports. That information should include supporting data where possible and if not, should still be able to demonstrate the likely implications.
- Regarding the question posed about when Equality Analysis Assessments needed to be produced; the Committee heard that whenever there was a plan to change or remove a service or a function or in respect of budget savings proposals they should be carried out.
- In respect of the commissioning process, the Committee heard that there were two key strands to how equalities considerations were embedded. Firstly, the legalistic – through the commissioning process, the constitution, the procurement handbook and through consideration of legal and equalities implications. Secondly, when services were commissioned and scoped, the service involved considered equalities throughout the design/re-design and specification process.
- The Committee heard the example of the remodelling of Laurence House. Right at the beginning the service involved would be considering users, those with protected characteristics etc. Once this goes to procurement and as part of the tender there would be a requirement for specific statements on equalities in addition to how they are addressed through the specifications. There would also be a standard requirement for a range of policy documents and commitments from the contractors. The report to Committee for approval would also need to have an equalities implications section and also the legal implications. Once the tenders have been returned the commitments outlined are then captured in the terms and conditions of the contract and contractors are required to sign up to the Council's Sustainable Code of Procurement which also has additional requirements.
- In relation to how equalities are considered specifically at the beginning stage of the service redesign etc., James Lee, Head of Culture and Community Development, gave an example to the Committee from a service perspective and gave the example of re-commissioning the drugs service. The relevant team would look at the way the current service was operating, the cohort of users, asking questions about service and access requirements questioning whether there were any barriers to access. This would then be in the service specifications that organisations would have to show how they would engage with all communities and then at the tender process they would be required to say how they meet the specifications and also specific examples in the

equalities methodology section as to how they would reach out to communities. The tenders would then be rated and assessed.

- A member of the Committee was concerned regarding the way the early stage of equalities considerations in service redesign was carried out in Lewisham and was concerned about the specific consideration of people with often hidden needs. There would need to be trust that the people designing the service had a really deep understanding of the different needs. For example, during this Committee's in-depth review into LGBT+ Provision, the Committee had discovered that there were no Joint Strategic Needs Assessments (JSNA) on any of the protected characteristics and the needs were not fully known and understood. The Committee member questioned whether there was confidence that all service designers had a good enough level of understanding about the 9 protected characteristics and were confident enough to articulate these needs and to challenge anyone tendering for the service. The appropriate research needed to be in place and accessible and shared with relevant people and updated.
- A member of the Committee stressed that it was important to have a thorough understanding of how the protected characteristics interact and intersectional challenges where discrimination is added on discrimination. It was very challenging but needed to be understood and taken into account or those most in need would not be supported.
- The difference between the theory and the practice should be examined. The Committee felt that the review was not about how the Council is "meant" to be doing, it was about how the Council is "actually" doing this work. The Committee agreed they now understood the theory but needed to look at case studies of where this has been applied well and where not so well to gain a better understanding of the reality.
- There was one member of staff in the Equality and Diversity team. Embedding equalities across the Council was felt to be important but Committee members felt that the Council was not yet at that stage.
- It would be possible for the Council to have a tenth characteristic of Socio-economic disadvantage even though it is not a statutory requirement.
- More information on the consistency of datasets would be useful.
- Ensuring there was commitment at a senior level was important.
- An Equalities Data digest across the nine protected characteristics was a possible proposal and this could be brought back to Committee including data on employment and other data. This should be updated on a regular basis.
- Members of the Committee felt that looking at a specific example including how the Council monitors performance in a systemic way including the quality and the depth and the thinking behind decisions was important for the review. The Committee therefore commissioned an additional evidence item – a procurement and commissioning walk-through exercise to be included in the Committee's evidence. This was carried out as part of the Committee's evidence gathering for this review and is detailed later in the section of the report and paragraph 5.51 below.

Lewisham Council Corporate Equalities Board – presented by Tom Brown, Executive Director for Community Services.

- 5.45 The Lewisham Council Corporate Equalities Board is a cross-council meeting with representation from all directorates, providing strategic direction for equalities across the council. The board updates and advises local decision makers. It does not “police” the directorates. Its role is advice, challenge and a “critical friend”. The board also receives and analyses equalities data and escalates concerns to DMTs and EMT as required.
- 5.46 In addition to this the board provides an opportunity for learning. This includes through: identifying and sharing best practice and peer learning across the council and with partners; reviewing Lewisham’s equality and diversity training; and Identifying and promoting opportunities for working with employee forums.
- 5.47 The Corporate Equalities Board also considered the evidence of Impact including by: Monitoring the data to understand causes of inequalities; looking at whether Council interventions were addressing inequalities; and whether the Council understood what is changing and for whom; and whether interventions were fair, reasonable and prioritising those in greatest need.

Questions and challenge from Members of Safer Stronger Communities Select Committee:

- 5.48 Following the presentation, members of the Committee highlighted a number of points.
- There were some areas of inequalities that were more understood than others and it was always a challenge to understand the complex nature of those with multiple characteristics.
 - Members of the Committee felt that they had received a lot of information on the framework of what should be happening regarding the consideration of equalities in the Council but would like to understand more about how it was actually carried out in practice. The Committee therefore commissioned a further piece of evidence looking specifically at Equality Analysis Assessments and exactly how equalities were considered within these in specific examples. It was suggested that this could include the equalities analysis connected to the Achilles Street ballot as this was a thorough and impressive example. The Committee requested a specific step-by-step example of how the Council has considered equalities implications and produced an Equality Analysis Assessment on two areas of work. One should be an example of where, in the opinion of officers, this was done well, and one where this was done not so well. This took place on 6th February 2020 and is detailed below in paragraphs 5.49 below.
 - The Committee requested information on the exact thresholds for officers in producing Equalities Analysis Assessments that were formally in place in Lewisham. As a direct result of the Committee’s request for information, new guidance was drafted for officers by the Council’s Legal Services to improve the clarity of the guidance. The new guidance is attached at Appendix 2

- The Committee were informed that socio-economic disadvantage was considered but not as a specific characteristic. It tended to form part of the layers of inequality faced by those with protected characteristics.
- The Committee requested information on when unconscious bias training would be delivered to senior management. In a response to this query and for the purpose of this review the Committee were subsequently told that this would be taking place from January 2020.

Equalities Analysis Assessments – workshop for the Safer Stronger Communities Select Committee

5.49 As detailed in the paragraphs above, the Safer Stronger Select Committee commissioned more detailed evidence on Equality Analysis Assessments. The presentations to the Committee can be found at Appendix 3. The presentations were delivered by: Paul Aladenika, Service Manager – Policy Development and Analytical Insight; Catherine Logan, Policy Development & Analytical Insight Officer; James Masini, Principal Development and Land Manager; James Ringwood, Housing Delivery Manager; and Natasha Valladares, Projects and New Supply Strategy Manager.

5.50 Following the presentations, there was questioning and challenge from the Committee members present and a number of points were highlighted.

- Lewisham Council uses the term Equality Analysis Assessment (EAA) and the Council's [Corporate Equalities Policy](#) sets out the requirements for EAAs.
- EAAs are required for major policy service change or major strategies. The EAAs should demonstrate the likely impact. This is different from Equalities Implications in reports which should include relevant considerations that could potentially impact a decision.
- EAAs should always be referenced in Committee reports and be appended to reports so all can see and cross-reference. If it's not there then that is not consistent with policy. Internally there is a reasonable expectation that officers undertaking the work would ensure they know the policy and undertake an EAA. Department Management Team and Service Management should also be aware and signing off therefore should know to check for EAAs. Corporately there was a Committee agenda planning process where this could be checked.
- Members questioned whether there could be a checking process built in (for example in Glasgow members have training and can send back reports that do not include EIAs when they are needed).
- The Council's Corporate Equalities Policy includes guidance for producing EAAs including data collection guidance. The policy was last reviewed in 2017 and was now under review and the recommendations from the Safer Stronger Equalities Review will feed into the process. There would be workshops on this throughout the organisation and targeted work with individual services.

Review of Equalities: Sanctuary Borough – opportunities and challenges:

- Currently, the standard data collection the Council used was usually based on the protected characteristic as defined under the Equality Act provision. Areas could be added such as refugee status, nationality, and socio-economic status. Some organisations already have data that could be shared. As part of the Sanctuary strategy, the possibility of including additional data as areas are identified and where appropriate was being taken forward.
- There had been a listening exercise with Lewisham Migration Forum as part of the sanctuary borough work. This had produced anecdotal evidence but not empirical data.
- The analysis undertaken for the Sanctuary Strategy EAA showed there was a lack of data.
- Sometimes a fear of showing incomplete data to Committee could be an issue. Providing confidence interval levels on available data would be useful to help members understand the confidence of the impact listed.
- It was important to have as much data as possible but lack of data should not be a barrier to submission of an EAA. Decision-makers need to see where there are gaps.
- It remained an on-going challenge to get personal information from service users even for statutory services as monitoring information is optional.
- The Council needed to think more about what could be done to ensure people want to and feel safe sharing their information with the Council.
- Better data sharing across the organisation and with partner organisations such as Lewisham Homes was really important. Officers need the confidence to know what they can share and to proactively support colleagues. Processes to share data openly between officers should be built in.
- The Democracy Review includes a recommendation on open data.
- The Council needs assurance that the data is safe and secure before sharing data. Also the agreement individuals made when giving the data needs to be suitable for any data sharing to take place.
- Corporate training on GDPR was important and an understanding of when and how to anonymise data.
- The language of the Equalities Act was quite specific and not always up to date. Thinking more about how people identify themselves and adapting language might be helpful to better engage people.
- Building bespoke IT solutions to effective data-sharing could be important.
- The Lewisham observatory webpages provided demographic statistics <https://www.observatory.lewisham.gov.uk/>

Achilles Street Estate Regeneration:

- The Achilles Street consultation was an example of good practice in consultation and engagement carried out by the Council and the EAA reflected this.
- 89 homes were balloted. The Housing Service had good data on protected characteristics etc. of estate members to know who was affected. The housing database from Lewisham Homes also gave access to data on tenants.
- A comprehensive consultation was undertaken. The team met with individual households, held drop in sessions, and had lots of contact with residents.

This helped them to pick up additional information such as on disabilities. The team found that the one to one meetings were giving lots of additional data. The team spoke to every council tenant and resident on the estate.

- Information such as bedroom size and medical issues meant that provision could be really tailored to the needs of residents. The consultation also led to Tenants and Residents Associations being re-established on the estate.
- Often seldom heard voices were being heard for the first time such as individuals who had previously been isolated. The Council worked with Studio Raw to do resident engagement exercises and provided food and refreshments. This encouraged a wider range of people to engage and have their voices heard as historically it could often be the people who complained most who were heard even if they were not always the most affected.
- Issues were picked up such as language challenges for some residents and as a result offers were translated into different languages. Other issues included housing management issues such as arrears difficulties.
- It was essential to understand the community to know how best to ballot to get a response. This led to the polling station method which was very successful in combination with more traditional methods such as online.
- It was time and resource intensive to carry out this level of consultations so that had to be factored in as it would not always be suitable.

Equalities in Commissioning and Procurement for Safer Stronger Members (Appendix A)

5.51 As detailed above. Following questioning of Council officers at Committee, the Safer Stronger Select Committee commissioned more detailed evidence on equalities in the commissioning and procurement process through a workshop which took place on 30th January 2020. The presentations given can be found at Appendix 4. The presentations were delivered by James Lee, Iain McDiarmid, Katharine Nidd.

5.52 Following the presentations, there was questioning and challenge from Committee members present and a number of points were highlighted.

- The commissioning process was distinct from the procurement process.
- Equalities monitoring took place from the end of contract process and was used in combination with statistical analysis and insight for future commissioning.
- The initial process was individual, based on the specific area. Some services needed a deep dive data analysis, others could use the contract monitoring from previous exercises as the basis.
- At the point a decision goes to the decision making body, whether a Committee or under delegated authority, it needed to have been properly thought through.
- With the UK leaving the EU, the government had agreed a “Lift and shift” of EU procurement policy for 2 years therefore OJEU thresholds would remain the same during this time.
- The commissioning process was a cyclical constantly evolving process not finite.

- The specification and method statement within the tender process addressed equalities aspects and specific equality and diversity questions were built-in.
- The Commissioning of the Stop Smoking Service was provided as an example. Targets were included for key groups including pregnant women, parents of asthmatic children, and people with long-term conditions. A socio-economic target was also built in and the proxy measures of: unemployed; retired; long-term sick and routine and manual workers were used. These were based on NICE guidance on socio-economic status.
- Over the course of the contract, there was constant monitoring to consider if some groups became under-represented or groups were missed etc.
- Sometimes there is a weighting exercise due to limited resources, with for example, groups such as pregnant women being prioritised. Lower numbers of more significant outcomes were prioritised.
- Following a question regarding whether weighting of equalities versus likelihood of successful outcomes took place, it was stated that they prioritised usually where there was most need or had biggest impact over where there was the highest quit rate for example.
- Sometimes tenders could be quite broad and seek the professional judgement of those tendering to compare and evaluate different approaches, focuses or targets etc.
- The re-commissioning of Sexual Health Promotion was provided as an example.
- The process was widely researched with extensive engagement, targeting key groups, and focus group. The Local Action Plan was key.
- The commissioning process took place following the [Lambeth, Southwark and Lewisham, Sexual and Reproductive Health Strategy 2019-24](#). This strategy was considered by the Healthier Communities Select Committee at their meeting in January 2019.
- Key areas in Lewisham included late HIV diagnosis and a focus on Black Caribbean men because there was a particular area of inequality relating to late diagnosis.
- Work was on-going to try to get a greater understanding of all those within communities including looking at intersectional issues to understand more.
- The reviewing process was really important and constant consultation and feedback took place to review and to hear from community voices/partners etc.
- Councillors asked a number of questions about the three areas presented:

“How do we (the Council) ensure individual service managers have a good enough understanding of all protected characteristics and the relevant data to be able to model possible implications?”

“Currently socio-economic considerations are not a legal requirement – how do we know we are making sensible judgements when an underlying factor for an inequality could be socio-economic and not related to a protected characteristic?”

“What are the datasets routinely used by service managers?”

“How do we (the Council) communicate our equalities considerations to the public?”

- The procurement and commissioning process had built in checks and guarantees including sign-off processes by Departmental Management Teams and then Executive Management Teams ensuring there were checks and balances. Data such as JSNAs, and information from engagement exercises and focus groups was used in the process.
- It was important that there was clear communication to decision-making bodies and they had confidence in the process.

Single Equalities Framework

5.53 The final area that this section of the report will consider is the Council's Single Equalities Framework (SEF). The Single Equalities Framework was presented to the Committee at their last evidence gathering session on 4th March 2020. The report presented the draft equalities objectives 2020-2024.⁹ The Committee made a number of comments on the framework and made a referral to Mayor and Cabinet.

5.54 Following the presentation, members of the Committee questioned and challenged a number of areas. The discussion is summarised in the points below:

- A socio-economic focus had been incorporated into the draft Single Equalities Framework (SEF) in response in part to the on-going focus on this area by the Safer Stronger Communities Select Committee. Equality objectives and prisms were arrived at following a strong focus on looking at the borough data and engagement with lots of different groups including the Equalities working group. In addition to this, looking at the findings of the Democracy Review, had led to the focus on the seldom heard group within the SEF.
- Members of the Committee were concerned that the SEF objectives were too broad and it would be hard for success to be clearly measured and defined. Members commented that the Glasgow model had a similar style of objectives but they were worded in a clearer way that made success easier to measure and define.
- A clearer definition of “seldom heard” could be useful as it was not a term that was consistently used with the same meaning or understood by all. It was important that objectives and prisms be understood by all members of the local community to help them identify with and understand the importance of them as well as to understand their role in equalities in the borough.

⁹ Single Equalities Framework 2020-24, report to Safer Stronger Communities Select Committee, 4 March 2020

<http://councilmeetings.lewisham.gov.uk/documents/s72174/06Single%20Equality%20Framework%202020-24%20Report%20to%20SSCSC040320.pdf>

- The Committee were informed that the SEF framework was a standard that all services would be held to and it would be their role to apply it to their service areas.
- Some members of the Committee felt there needed to be an associated action plan clearly defined to ensure implementation and compliance and consistency across the Council.
- A member of the Committee felt that the language needed to be more specific. For example "promote" and "tackle" were not clearly measurable in terms of what outcomes would be expected.
- Some members of the Committee felt there should be an on-going discussion around terminology. In particular whether the term BAME was suitable or whether certain groups felt excluded or not represented within the term.
- Members of the Committee agreed that a recommendation should be made to Mayor and Cabinet and included in this review.

Safer Stronger Recommendations to Mayor and Cabinet – March 2020¹⁰

Safer and Stronger Communities Select Committee Recommends that:

- 1. A more proactive approach should be taken to address the Public Sector Equality Duty.*
 - 2. Equalities objectives should be readily understandable to the public.*
 - 3. Equalities objectives should be specific, achievable and measurable.*
 - 4. Equalities objectives should identify areas of work via which improvements in equality can be made.*
 - 5. These areas of work should identify the relevant protected characteristic/s it intends to benefit, the measures via which success can be evaluated, and be specific on which organisation is responsible for leadership in this area of work.*
 - 6. Whilst specific and targeted work to improve equality is needed, meeting the Public Sector Equality Duty and addressing the equality objectives is a collective duty of the whole Council; every decision should further equality and improve fairness, and be evaluated as recommended by the SEF using the equality objectives and prisms.*
-

Summary and Key Findings of section 5

- 5.56 This section contains information on the current situation in Lewisham in terms of equalities policy and processes. It covers areas such as the Comprehensive Equalities Scheme/Single Equalities Framework, the Council's Corporate Equalities Policy and information on how equalities is built into commissioning and procurement as well as how it is built in through Equality Analysis Assessments. The evidence formed a basis for the Committee to consider what was working well and where there were gaps and

¹⁰ Single Equalities Framework, items tabled at meeting, Safer Stronger Select Committee, 4 march 2020

<http://councilmeetings.lewisham.gov.uk/documents/s72725/06SingleEqualityFrameworkitemstabledatmeetingSSCSC040320.pdf>

helped the Committee when considering the evidence in sections 7 and 8 on good practice and the evidence from community partners. Members of the Committee were grateful to the officers who gave evidence through Committee meetings and through workshops for this section. Key areas that helped to shape the Committee's recommendations included looking in more detail at data sharing and the accessibility of data and considering how to imbed consideration of socio-economic factors when looking at equalities. Other key findings emphasised by the early recommendations the committee made to Mayor and Cabinet in March 2020 focused on ensuring objectives were clear and measurable.

6. Lewisham Council as an Employer and the Employee Profile

- 6.1 The Committee were keen to consider Lewisham Council as an employer looking at whether the Council was meeting equalities obligations as an employer, whether staff were treated fairly, whether barriers existed and whether different groups and those with protected characteristics were represented at all levels in the organisation. They were also keen to consider whether the Lewisham employee profile reflected the community Lewisham serves.
- 6.2 The Committee requested Adam Bowles, Director of Organisational Development & Human Resources provide information on key trends in the Council's workforce and information on the staff survey results. The evidence also included looking at the Council's employment profile 2018-19.¹¹

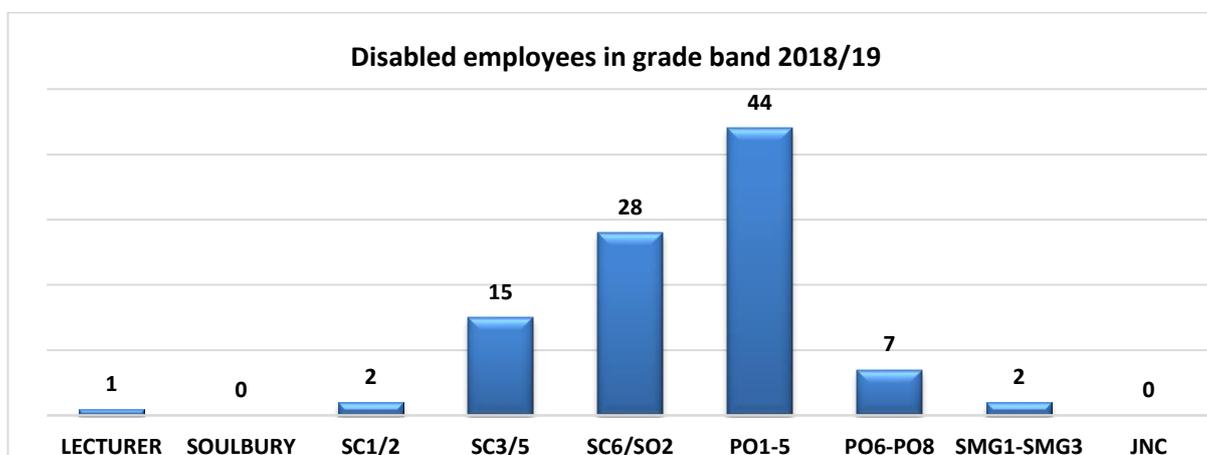
Staff Survey

- 6.3 The Committee were informed that participation in the staff survey had increased to 50%, employee engagement had increased by 5% and that overall there were only minimal differences in terms of ethnicity, gender, and sexuality. However, there were some differences, this includes female employees being more likely to experience bullying and harassment; and lesbian and gay employees having less confidence in senior leadership. Disabled employees were also significantly more dissatisfied across all question areas.
- 6.4 The Committee noted the number of employees saying that they did not understand how their own goals and objectives fitted in with the wider organisation and asked what was being done to improve this. They were informed that more information on the performance cycle was being made available in order to connect service plans with the corporate strategy, and the corporate strategy was being linked to appraisals. There would also be training with managers and better internal communications.

¹¹ Council's Employment profile, report to Safer Stronger Communities Select Committee, July 2019
<http://councilmeetings.lewisham.gov.uk/documents/s66612/06EmploymentProfile2018-19SSCSC160719.pdf>

Lewisham Staff Profile

- 6.5 The Council's staff profile 2018/19 showed that 42.9% of the Council's workforce is from a BAME background. This broadly reflects the workforce across London Councils, although it is slightly below the Lewisham borough profile based on the 2011 census. BAME employees account for 16% of the top 5% of earners in Lewisham (those in the grade bands SMG1 – SMG3 and JNC). This compares to a median figure of 17% across all London Councils. The evidence to Committee stated that further work needed to be taken, particularly in recruitment activities to ensure that there is more BAME representation at Director and above level to better reflect the Lewisham community. The report stated that senior vacancies due to their higher salary, attracted people from a wider geographic area where the demographic profiles were different to Lewisham's.
- 6.6 The profile showed the majority (61.2%) of the Council's employees are women and compares to the median figure of 63% for all London Boroughs. Lewisham was one of 9 London Boroughs who reported a negative mean (-10.6%) gender pay gap in 2018. A total of 4.2% of non-schools employees have declared that they consider themselves to have a disability. This is based on a response rate of 58% of the employee workforce. The rate compares to a median of 4.75% disabled employees across all London Councils and to the Lewisham population figure which is approximately 15% of residents.



Unite the Union

- 6.7 The Committee invited representatives from the main three Council workforce unions: Unison; Unite the Union; and GMB. The Committee were grateful to Gary Cummins, Unite the Union, for attending the Committee meeting to give evidence on some of the key successes, challenges, and concerns that union members had working for the council.
- 6.8 As a union, Unite felt that that the key challenge remained how to continue providing a high level of service to residents given that the council has fewer

people and less money and this was a concern of its members. They also highlighted a number of other concerns including: the conformity of council policies to ACAS guidance; the consistent application of flexible working; the appropriateness of some referrals to occupational health and the consistency of the weighting between GP and Occupational Health reports. There had also been issues raised about the use of annual leave during a phased return to work following a period of long-term absence and concerns raised among some BAME members about progression through the organisation

6.9 The union welcomed that a number of agency workers had been taken on full time, but was concerned there that there were still a number of people on short-term contracts and agency workers with long-term service.

6.10 The Head of HR reported that there is a formal structure for trade unions and senior staff to resolve disputes. There are quarterly directorate meetings and an organisational meeting chaired by Director of Resources. If there are disputes that could not be settled through this process they could be escalated to the works council, which is cabinet member-led. Although all the Council's policies comply with legislation, some of the policies and timeframes within them may not exactly follow ACAS guidance.

6.11 During the questions and challenge a number of areas were highlighted by members of the Committee:

- Overall, the BAME workforce increased 1.2% from the previous year.
- A BAME staff forum was due to be set up. There is already a LGBT+ forum and a Disability forum.
- There is a gender pay gap of 10.6% in favour of women. Some of this is due to the profile of the workforce: the council has a relatively large manual workforce, which tends to be male, and a large number of social workers, which tend to be female.
- More job applicants were from women (58.8%) and more women were appointed (68.7%).
- There was a drop between the number of BAME applicants (60%) and those interviewed (53.3%), but a similar proportion move from interview to appointment. The Committee heard that work is being carried out to investigate the drop off between application and interview. This will include trialling anonymised applicant CVs in some areas.
- Of the workforce promoted, 72% were women, which is higher than the female percentage workforce rate of 61.2%. 41.5% of promoted employees were BAME, this is slightly lower than the BAME workforce rate of 42.9%. 100% of those that applied for promotion and who declared that they had a disability were successful in being promoted.
- The Committee queried what other categories of non-voluntary leavers there are other than dismissal. Subsequently they received details outlining this as below:

Year 2018/2019

Leaving Reason	Number
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Mutual Agreement	4
Dismissal	9
Retirement-Efficiency	6
Some Other Substantial Reason	1
Death in Service	2

- The Committee heard that part-time working was encouraged and that the council was planning to sign up to be a Timewise employer.
- The Committee requested figures on how many people take shared parental leave. Subsequently they received details outlining this as below:

The numbers of staff that take shared parental leave:

Year	Number
2016/17	3
2018/19	5
2017/18	1
2019 to date	1

- The Committee noted that the Council monitors the rates of promotion from parental leave. It was noted that the figures on this were too small to report without possibly identifying individuals. However, work would be carried out so this could feed into next year's statistics.
- The Committee queried rates of promotion in relation to LGBT. It was noted that the figures on this were too small to report without possibly identifying individuals.
- The Committee were concerned about the use of leave as part of the Council's phased return to work policy and requested additional information on this. This was subsequently provided by the Director of Human Resources and is detailed below:

Lewisham Council - Extract from Absence Policy - Phased return to work – presented to Safer Stronger Select Committee by Head of HR, Jan 2020.

The purpose of a phased return to work is to enable the employee to return from a period of sickness absence to their full contractual hours where their medical condition, as confirmed by Occupational Health, prevents immediate return to normal working arrangements.

A phased return to work will not be an automatic right, because it will be subject to:

- *the service area being able to accommodate the arrangements taking into account the employee's role and service needs*
- *time limits and taking into account any cover requirements*
- *taking into account medical advice received from the Occupational Health Service but the decision to allow a phased return will rest with management*
- *during a period of phased return, any non-working days/ hours, will need to be taken as annual leave, unpaid leave, flexi or TOIL.*

Summary and key findings of Section 6

- 6.13 This section looked at the Lewisham Staff Profile and extracts from the staff survey results as well as by questioning the Director of Organisational Health and HR and evidence from Unite the Union. This evidence helped the Committee to benchmark and compare with similar organisations when looking at best practice. Staff Equalities Forums were felt to be a key area the committee wanted to explore further. Ensuring these functioned effectively and were supported could help to improve staff well-being and help to promote equality of opportunity within the workforce.

7 Best Practice including socio-economic inequalities

- 7.1 Members of the Committee were keen to hear from a variety of organisations about their experiences and consider examples of good practice. The key areas they were considering were what the best performing local authorities and government organisations doing, as well as looking at how local authorities can take socio-economic factors into account in terms of promoting equality?

The Local Government Association

- 7.2 The Committee requested evidence from the Local Government Association (LGA) for their review, the full submission can be found at Appendix 5.
- 7.3 The IDeA and LGA produced “The Equality Framework for Local Government” (EFLG) which is a self-assessment tool that can be used by Councils to measure their performance. The aims include helping Councils to:
- deliver accessible and responsive services to customers and residents in their communities including those from protected characteristics
 - employ a workforce that reflects the diversity of the area they are serving
 - provide equality of opportunity for all staff
 - Meet the requirements of the Public Sector Equality Duty
- 7.4 The Framework seeks to help with compliance with the Public Sector Equality Duty and references the nine legally protected characteristics under the Equality Act. It also encourages Councils to consider other issues that might be affecting their staff such as caring responsibilities as well issues affecting communities such as socio-economic inequality.
- 7.5 The EFLG is supportive of the EHRC’s six selected domains of equality measurement which it has identified as the areas of life that are important to

people and that enable them to flourish. They are: Education, Work, Living standards, Health, Justice and personal security, and Participation.¹²

- 7.6 The Framework sets out four modules for improvement underpinned by a range of criteria and practical guidance that can help a Council plan, implement and deliver real equality outcomes for employees and the community. The four modules are:
- Understanding and working with your community
 - Leadership and Organisational Commitment
 - Responsive Services and Customer Care
 - Diverse and Engaged Workforce
- 7.7 For each module there are three Levels. Developing; Achieving and Excellent. The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities. Councils can be at different levels of the framework for different modules.

Good Practice examples from recent LGA equality peer challenges

- 7.8 The LGA provided a number of case-studies, these are detailed in Appendix 5 . The case studies show some common themes including:
- Comprehensive and accessible data readily available to all.
 - Member champions for equalities
 - Extensive partnership working
 - Targeted projects and programmes based on community needs
 - Community insight and intelligence
 - Wide-range of training for staff and members on equalities and diversity
 - Supporting most economically vulnerable such as through homelessness prevention and supporting people on universal credit.
 - Use of the social value act in commissioning to prioritise the most economically vulnerable. For example Manchester CC which has increased the weighting given to social value considerations in the tendering process from 10% to 20%. Outcomes from this approach include suppliers creating 423 employment opportunities for hard to reach individuals, 705 apprenticeships and 1,160 jobs.

¹² EHRC Measurement Framework for Equality and Human Rights, 2017
<https://www.equalityhumanrights.com/sites/default/files/measurement-framework-interactive.pdf>

LGA Case study – City of Wolverhampton Council – Awarded Excellent Autumn 2018

The Council's "WV Insight" website gives staff and the public access to information and data sets developed from several sources including the Office of National Statistics, Public Health and the Joint Strategic Needs Assessment (JSNA). The data is aligned to the Equality Framework for Local Government. It enables users to drill down to consider trends and compare CWC to its near neighbour councils and conduct gap analyses on equality criteria.

All elected Members receive annual equality training and on induction. There is a Members Equality Advisory Group (EAG) with a very good knowledge of their communities & local issues. EAG has a diverse makeup in terms of gender and ethnicity. Members of the group are trained on the WV Insight tool to help them to understand the emerging trends and changes within their communities.

The Council has taken some bold initiatives that impact beyond the local authority area e.g. the Paulette Wilson Windrush Migrants Initiative. The project is named after a Wolverhampton resident who was detained as part of the scandal. CWC developed a project with the city's Refugee and Migrant Centre to assist and support those who came from the Commonwealth prior to 1973 and who may be affected or worried about their immigration status. It provided one-year funding for the project and its launch on the 9 May 2018.

Each service produces an annual service equality action plan and has a service equality group and an equality champion. Performance on service equality plans is reported through the relevant governance processes and presented to the Members.

The Council has set up a Community Reference Group which acts as community moderators in the event of critical incidents of gang crime. Members of the group include community leaders, third sector organisations as well as parents of victims and perpetrators.

There are four well-established staff equality forums (Race, Gender, Disability and LGBTQ) which have clear structures and regular meetings. These are open to all staff in the council and have memberships from across the organisation. Forums are recognised as a source of innovation and good ideas (for example the Maternity and Disability Buddy Schemes, and the need for Unconscious Bias training).

Socio-economic Equality Actions

"Wolves at Work" uses data to identify and target key groups. In this case to receive support around employability.

CWC offers more of its contracts to local SMEs rather than national organisations as a result of its policy of breaking down contracts into smaller lots by area. An example is the Advocacy contract which was increased from 2 lots to 5. Outcomes of contracts are analysed by protected characteristics. Questions on social value are included in tender questions and social value (with a focus on equality) is also used.

The Council supports a Parental Ambassadors scheme which provides opportunities for the better integration of migrants. The scheme is recognised as best practice at a national level. It offers an accredited training course in becoming a community ambassador to parents newly arrived in the City. Twenty newly arrived migrant parents who were unemployed have qualified from this course and a number have found employment in Wolverhampton schools. They are providing daily interpretation and other key support to newly arrived children with additional language requirements. The scheme has had positive outcomes for both education and employment.

A range of actions have been introduced over the past two years to address lack of workforce representation at senior levels. These include having diverse selection panels; introducing mandatory unconscious bias training for all staff involved in selection decisions including members; requiring recruitment agencies to produce diverse shortlists; having anonymised applications for all posts; giving guaranteed interviews for all disabled applicants meeting the vacancy criteria.

London Borough of Sutton – Fairness Commission

- 7.9 During the Committee’s consultation with community partners the work of LB Sutton was highlighted to the Committee for their Fairness Commission. A visit was organised as part of the review and the Committee Chair and Vice-Chair and Scrutiny Manager met with Simon Breeze, Policy and Projects Manager and Alison Navarro, Chief Executive, Community Action Sutton (CVS Sutton)¹³ and Chair of the Sutton Fairness Commission.
- 7.10 LB Sutton set up the Fairness Commission in 2017 as a method of engaging the community and ensuring their expertise were built into the Equalities process in the Council. The Commission is hosted by Community Action Sutton and includes key community groups and stakeholders. The Commission chose an investigative theme on which to focus – the first of which was “the life chances of children in the borough”. They reported on this in December 2018.¹⁴

“The overall aim of the Commission is to work to ensure that the benefits of living in Sutton are enjoyed by all sections of society. The commission will work to 'eliminate discrimination', 'advance equality of opportunity' and 'foster good relations' amongst all in the borough, including those from protected characteristic groups. In line with the Sutton Plan and the borough’s focus on partnership working, the Fairness Commission will be the main vehicle for external equality and diversity activity. The Council will act as a critical friend for partners and will also receive input and feedback on its services, policies and commissioning processes via the Commission.”

- 7.11 Members of the Committee were informed that the initial theme chosen was key and needed to test the process and cut across many equalities themes. Members of the Commission agreed the issue – a focus on children and young people. Engagement was crucial – they discussed with Council CYP colleagues and met with key groups such as: looked after children; and ex-offenders. They held a Fairness Commission conference and invested in an event for young people which they led themselves (this was seen to be very important as the lead and directions had to be from the community groups themselves and not the Council). By the CVS chairing the Commission, they felt they could reach more people than the Council and focus on cross-cutting issues that are separate from the image many have of the Council.
- 7.12 The Board was chaired by the Chief Executive of Community Action Sutton and included the Councillor Lead for Equalities and Executive member. After the first year it was recommended that the Fairness Commission become the only vehicle for delivering the Council’s external equalities function. Following this, the representation was formalised to include: Cabinet Lead for Equalities;

¹³ A Council for Voluntary Service (CVS) is a type of charity in England and it is the place where local voluntary and community organisations speak to each other and get support.”

¹⁴ The Sutton Fairness Commission Report, June 2018

<https://moderngov.sutton.gov.uk/documents/s63124/6%20The%20Fairness%20Commission%20Final%20Report%20-%20Appendix%20A.pdf>

Chair and Vice-Chair of People Committee; representatives from opposition parties within the Council; a Principal of a local college; Police representative; Fire representative; and a representative of the Education sector. The Chair remained the same. The following link below is to the report making the Fairness Commission the [Council's external equality function. \(Item50\)](#): The Chair reported that: *“At this stage the Commission was re-energised again with a new theme and a dedicated Council officer to support the work.”*

- 7.13 In terms of funding, the Council provided £10,000 initially. Support is now through officer time. Within Community Action Sutton's contract with the borough there is a built-in focus on equalities and with community development. Recommendations made by the Commission go to the relevant Council Committee. (LB Sutton operates under the Committee system model). The reports can be critical of the Council, for example, one of the findings said there was a lack of leadership.
- 7.14 Three topics were being considered for the next theme: the gypsy and traveller community; race equality work to develop a BAME strategy for Sutton; and participation of disabled people in community life. Partners such as the Police could also use their own youth engagement strategies etc. Access and engagement would continue to be key. The Runnymede Trust had done a bespoke piece of work on race equality in Sutton.¹⁵
- 7.15 Following questions and discussion a number of other points were raised:
- The Sutton Fairness Commission is not part of the formal consultation for Council officers when producing EIAs. The Commission can aid with policy development, scrutinising delivery, acting as a critical friend.
 - There was a review of Children's Services and Early Help Policy at the Council that has been driven by recommendations from the Fairness Commission.
 - There is a positive relationships between the local authority and community sector and a shared sense of issues, process and relationships.
 - It was important for the organisation running the commission to be embedded in the community.
 - A youth participation framework could be important.
 - In terms of consultation events, positive work had been done through the Volunteer Centre with a group called Citizen Commissioners and Young Commissioners. They are given training and take part in interview panels and are consulted with on Council policy changes etc.
 - The Council also consulted Citizens panel and had a commitment to engagement. Ensuring the Council engaged early and in a meaningful way was a continuous challenge. The Volunteer centre organised the citizen assembly. This was useful for people developing their skills and

¹⁵ Sutton Race Equality Scorecard, Runnymede Trust <https://www.runnymedetrust.org/projects-and-publications/parliament/scorecard/sutton.html>

CV and full training involved. The assembly was involved in how to spend money such as in parks.

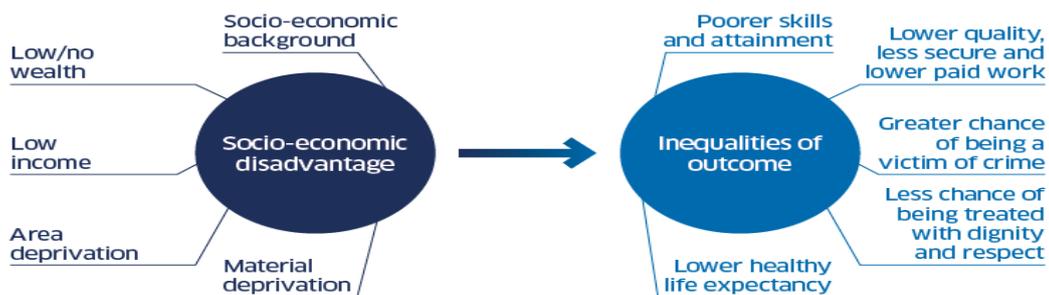
- The Commission found that the word “fairness” was a more inclusive word than “equality” and more easily understood.

Glasgow City Council



- 7.12 A strong focus for evidence gathering for the Committee has been consideration of socio-economic inequality. As outlined in section 4 of this report, the Fairer Scotland Duty is embedding consideration of socio-economic inequality in law in Scotland. Members of the Committee visited Glasgow on the 4th February 2020 and met Councillor [Layden](#), City Convenor for Equality and Human Rights, as well as Afton Hill, Policy Officer, Cormac Quinn, Principal Policy Officer, Thom Hughes, Senior Corporate HR Manager, Gerry Quinn, Poverty Leadership Panel Manager and Sandra McDermott, Head of Financial Inclusion. (Convenor is a similar role to Cabinet member at Lewisham).
- 7.13 The city of Glasgow has a population of around 620,000 people with approximately 12% BAME. 34% of Children (37,500) in Glasgow live in poverty and 58% of households in poverty are in work. The City Council has 85 elected Councillors representing 23 wards across the city. The Leader of the Council is Cllr Susan Aitken (SNP). The political make-up is as follows: SNP 39; Scottish Labour 31; Scottish Conservative 8; Scottish Greens 7. The Council's executive Committee has 23 multi-party members, divided proportionately - 11 SNP, 8 Labour, 2 Conservative, 2 Green.

- 7.14 The Council has a strong focus on consideration of socio-economic deprivation. Their policies aim to take a flexible approach, to adjust for intersectionality and be “able to reflect the life experience of all people”. The Council is committed to writing Equalities Impact Assessments for all policies and changes to service and to publishing these on the Council’s website.
- 7.15 The Council has 4 important equalities aims that underpin its equalities work:
1. Improve economic outcomes for people with protected characteristics.
 2. Increase people’s knowledge about equality and fairness
 3. Increase access to the Council for those with protected characteristics
 4. Promote and enforce respect and dignity in Glasgow.
- 7.16 Other priority areas include:
- Mainstreaming Equalities in all aspects of decision-making and showing leadership.
 - Embedding Equality Impact Assessments (EIAs) into everything
 - The importance of a robust evidence base
 - Active engagement with communities to understand their perspective/concerns and priorities.
- 7.17 The Council has a Poverty Leadership Panel [*People make Glasgow fairer*](#) Socio-economic inequality is an important term. The term considers that Income inequality is distinct from social inequality hence “socio-economic inequality”. As outlined in the table below, socio-economic inequality includes factors such as: income; wealth; area deprivation; material deprivation and socio-economic background and can therefore be argued gives a more comprehensive understanding of the inequalities of outcome that may result from these.



Poverty impact screening process:

- 7.18 Glasgow City Council is working with the University of Glasgow and developing a tool to refine the poverty impact screening process and to align this with the EIA. Other areas of work include collaborative workshops for employees and member consultation and a strong focus on improving the measurement of outcomes. There is a very strong focus on outcomes and demonstrating impact rather than volume.

7.19 Members of the Committee were particularly interested and impressed by the work Glasgow City Council undertook on Equality Impact Assessments. They were shown details of the training provided for officers and councillors, the guidance on producing successful EqIA and the screening forms used at the very first stages. Members of the Committee present felt these documents could be really useful for Lewisham Council and contained a lot of valuable learning. The full documents are included in Appendix 6 of this report. Members of the Committee present also felt that the extent to which equalities was consistent and embedded in Glasgow City Council could also be important with lessons to emulate.

7.20 During the questions and discussion on EqIA a number of key points were highlighted:

- It was important for elected members to understand what the staff do in terms of EIAs so all members have training. There is also an online training guide.
- The policy team put lots of effort into face to face discussions to reinforce the process.
- Socio-economic impacts affect all of the protected characteristics and Socio-economics is intrinsically related and looked at across characteristics.
- Human rights considerations were included. This included absolute rights and limited rights which were both important. Also, qualified rights - where the rights impinge on others or cause dangers and others need to be protected.
- All reports to Committee should have an EqIA attached. Report authors can say if it's not applicable and state why.
- Officers start with the equalities screening process (see appendix 6) and professional judgement states how much is needed. It shouldn't become obfuscation from excessive and unnecessary information being included.
- HR equalities implications were considered under a separate process because of employment law. This was an HR EIA.
- Health impact assessments were usually only carried out if working with health authorities. If clinical dimension then carry out with health partners.
- It was really important to get the title and purpose correct for the EIA. Each one was logged by Corporate Services and support provided. This ensures a clear Council-wide reporting. It was the duty of individual officers to ensure all EIA were notified to corporate resources. Sometimes they went before Committee before this has happened and as Members had had full training they were able to challenge individual officers as to whether this had happened. This provides an additional check mechanism.
- All EIAs were put on the Council's website and the public could view these.
- Glasgow's view was that EIAs were not finite and a 6-month review was built into them.
- It was an on-going challenge to ensure all staff fully understood the process.
- Gathering evidence was essential. In the guidance, key statistics were brought up about each of the areas in a matrix system (see slide 10 in Appendix 6). This was really useful for staff. The data was refreshed approximately every 2 years. It was not everything but a really good level of information on each of the areas. All Council staff had access. This was a

comfort for people starting with EIAs to get an overall background level of info. The matrix design meant it was easier to share good data/work.

- There had been very few occasions where the EIA had stopped the policy. Although this had sometimes occurred with budget reductions.
- Impact assessments had to be shared and were the collective responsibility of all project partners. A process of on-going review was built in.
- Really clear forms and procedures were important and the screening form was a useful tool for officers. Services need to remain flexible - usually expect "yes" or "not at this stage" on the considerations and rarely would it be "no".
- Council PIDs (project initiation documents) include a reference to EQIAs and there was proactive work with procurement.

7.21 Members of the Committee held a discussion with **Councillor Layden, City Convenor for Equality and Human Rights**. Committee members were impressed by the extent of member involvement in equalities and the clear models and training available. During the discussion a number of key issues were highlighted:

- The implementation of [Community Empowerment Act in Scotland](#) had highlighted the importance of consultation and areas such as participatory budgeting. Equalities within this was a key consideration.
- Training for elected members was really important. Members were empowered to go through impact assessments.
- Equalities was built into everything. All Committees had an equalities remit rather than being for consideration by just one Committee. This was listed in the terms of reference of every Committee.
- Lewisham Councillors commented that it was useful that the Glasgow equalities objectives were collated into one document as opposed to Lewisham where it was suggested that they should be considered through the individual strategies. They liked that the 4 aims were broken down and included identifiable deliverable and quantifiable measures of success. They asked Glasgow how they got to that detailed stage.
- The response was that it was based on consultation. 9 months of engagement and a 3 month Committee cycle. The [Mainstreaming report](#) covered some of the areas but the Equality outcomes were the main aims. Consultation had taken place with community groups and frontline facing staff (Glasgow has 24,000 staff). There were workshops for frontline facing staff on challenges they faced. National research was also used to pull together key issues that needed to be addressed. This all then went back out to elected members and community groups. Once they were happy with the aims – this then went back to the community groups to ask what actions should be taken through the Equalities working group to set measures of success.
- A review of what has been done will take place with feedback from the third sector. Some outcomes will likely be kept and some new ones will be started based on those dialogues.
- Priorities and measurement methods can be changed throughout the process in response to emerging issues/new data.
- Consultation takes place online on existing outcomes and emerging issues. Research is undertaken and third sector and members consulted. There are

face to face workshops (half days) and 1 to 1 dialogue with key third sector contacts. The information is used to develop the draft.

- The Council had used Ipsos MORI for data gathering when there were gaps in the data held.
- Ipsos Mori had helped with getting information on some of the lesser heard groups. Using Ipsos Mori had given the intelligence to understand the data gaps since the 2011 census.
- Lewisham Councillors commented that Lewisham had outsourced some of their consultation to a number of groups and stopped consulting the community and started consulting these groups which were “semi-institutionalised”.
- Glasgow tried to challenge themselves when they were repeatedly hearing the same voices. Consultees sometimes focused on personal issues rather than wider issues therefore missing out particular groups and voices could be a problem. This was emphasised by a consultation on British Sign Language (BSL) that the Council was carrying out and where none of the disability groups who were usually consulted were related to that area. In addition to this, intersectional issues could be missed. The BSL consultation had been a big learning-curve. The community didn't necessarily see it as a disability but a cultural and language issue and therefore consultation methods had to be adapted.
- There was a Community Planning Partnership which included representatives from the community, planning, NHS, Police, university etc.
- The Council had an Equality Network, where anything related to equalities issues could be emailed out to all involved. This was run through an Equality organisation funded by the Council who delivered this service. All equalities consultation went through that list and it was a very valuable resource.
- Consultation and engagement was a theme of the Lewisham Council's Democracy Review.
- Consultation fatigue was a real issue so consultation needed to be balanced and be based on 2 way conversations. There needed to be honesty and results needed to be fed back.
- It was helpful for members to have an elected member with a specific equalities lead. This also helped to raise the equalities profile in the decision-making process.
- Council staff were a major part of the equalities mainstreaming report and aims.

7.22 Members of the Committee also requested information on Glasgow's staff Equality and Diversity Networks. They held a discussion with the Glasgow City Council's Senior Corporate HR Manager. During the discussion a number of points were considered:

- HR and employment were related to Equality and were part of how the Council considered equalities and embedded it within the Council's Mainstreaming and progress reports.
- In terms of staff networks, in the past there were smaller networks which tended to be based on discussing people's complaints and concerns. The approach did not appear to be useful for the majority of people and also could

exclude certain groups within protected characteristic groups. The individual networks were abolished and the Council tried one big staff network which was not a successful approach. The Council then went to staff groups based on the protected characteristics.

- The women's network had focussed on issues such as equal pay and gender pay gaps. They used the Lean In model (Facebook) and peer to peer support for women. Other events included a Menopause café. The network also supported local charities for women.
- All networks were peer to peer support focussed. Groups included: Women's, BAME, disability, LGBT, and a carers support network.
- Formal structures including Terms of Reference and elected Chairs were removed. Individuals came forward if they were interested in leading. Officers were given support and time from their day job to run the network.
- Coordinators could often use the experience to progress in their career, so there was mutual benefit to the individual and to the organisation. There were 4 meetings a year in each group.
- Each network has a principles document (rules and rough aims but not too formal).
- A yearly survey of network members was carried out asking for thoughts on what had been done well/what to do moving forward etc.
- The network groups were often used as a consultation/information source. For example the female workforce on their experience of maternity.
- There were 700 members of staff in staff networks. The Women and LGBT networks were particularly successful and included speaker-led events and conversation cafes.
- The Disability staff group had not been that well attended, therefore HR would be facilitating returning to a conversation cafe to get back to the individual issues being faced.
- The BAME network also looked at religion and culture because that's what the members had said was needed.
- Staff completing EIAs were encouraged to use staff networks for their experiences.
- Each network has a member sponsor.
- Many of networks had a strong focus on progressing in the organisation with the exception of the Carers' Network which was more focussed on support for individuals' challenges.
- There were links between Equalities and health and well-being. Each service had an employee action plan for their own network.
- Staff networks were open to everyone not just those with the protected characteristic themselves.
- Survey results showed membership had been beneficial for staff.
- The LGBT network had had an impact on museum collections. Through LGBT history in museum, the Kelvingrove museum had carried out tours of artefacts in the museum with an LGBT link.
- Glasgow City Council was a Carer Positive organisation.
- A young employees' network was being considered.
- The Council copied the successful models used in many of the big corporations such as RBS etc. and tried to replicate practice.

- There was zero budget initially for the staff groups but now the City Council had seen the benefit, they had been given a small budget. Training was now provided for staff members so they were given something back for the work they had put in. For example 5 places on the Glasgow Herald Diversity Conference had been provided. Looking after and motivating the coordinators was also a key factor.
- A lot of the events were about promoting opportunity for example International Women's Day.
- Intersectionality was always an important consideration and the network coordinators met formally with the support of HR.
- The Council had worked with partner organisations to create a BAME leadership programme. A member of staff can apply and select individuals to participate in a 6 month management programme. There was a strong mentoring element. The Council had had progress in BAME progression upwards in the Council but more needed to be done. Working with local partners and training programmes for people applying in the Council. Job adverts now included a line stating that the Council: "Particularly welcome applications from disabled and BAME applicants". This was justified because of the disproportionality between the workforce and the wider population.

Summary and Key findings of Section 7

7.23 The Committee were very grateful to the Local Government Association, the London Borough of Sutton and to Glasgow City Council for the information provided and for the discussions held. Committee members felt that the learning from these organisations was very important to the overall findings and recommendations from the review. The importance of consideration of socio-economic disadvantage was a key area of importance for the Committee. In addition to this, good practice on data sharing and the availability of data were also drawn out as key areas. Glasgow City Council's staff forums were also an area of particular interest in terms of how they were set up and supported to thrive and how they could be an instrument of advancing workforce equalities.

8 Consultation

- 8.1 Identifying and addressing barriers to engagement of communities that do not traditionally access services or have a disproportionate representation within particular services is consistently a key issue for the Safer Stronger Communities Select Committee and they were keen to hear from partner organisations and the community.
- 8.2 Through the Council's Main Grants Programme, a number of organisations are funded to take a lead on identifying and addressing barriers to engagement of communities that do not traditionally access services or have a disproportionate representation within particular services. The Metro Centre has been commissioned by the Council to provide a strategic equalities lead including leading the Lewisham Equalities Forum. Other Lewisham organisations include: the Stephen Lawrence Centre to work with black and minority ethnic communities; the Lewisham Refugee and Migrant Network to

work with refugee and migrant communities; the Lewisham Pensioners Forum to work with older people; and the Lewisham Education Arts Network (LEAN) to work with young people. At the request of the Committee, The Committee's Scrutiny Manager presented the Committee's scope at a meeting of the Equalities Forum and invited all participants to submit evidence either as a formal submission or via discussions. Groups were invited to share their experiences in Lewisham and those of the communities they support as well as any comments they had on any aspects of the reviews key lines of enquiry.

- 8.3 The Committee also contacted the Lewisham Interfaith Forum, the Lewisham Young Mayoral Advisors and The Chair of the Lewisham Disabled People's Commission. This section outlines the submissions received and a summary of a workshop held with the Young Mayoral Advisors.

Young Advisors Consultation



- 8.3 At the request of the Committee, an Engagement exercise was carried out with the Lewisham Young Advisors Group for the Committee's review. The Scrutiny Manager attended the Young Advisors meeting on the 9th December 2019 and gave an introduction to the Committee's review. This was followed by an engagement session to get the views of those present facilitated by Jacob Sakil, Young Mayor Advisor Team.
- 8.4 A full summary of the session can be found at Appendix 7. A number of areas were highlighted by the young people present and there was a strong theme amongst the comments about the voices of young people not being heard or understood and their views taken into account. Examples such as cuts to Youth Services, access to libraries and being stopped from being in groups of more than two in Lewisham shopping centres were listed.

- 8.5 Many of the young people present had specific barriers to access services that had been experienced by themselves or peers that they want to share. Examples included a hearing loop not being provided at a school careers event which stopped a pupil being able to attend. Places not being autism friendly, and places prohibiting groups of young people such as shopping centres.
- 8.6 Some of the young people commented on why they decided to be involved in the Young Advisors and this included having the opportunity to meet others, work together and make change and to hear about a range of new things.
- 8.7 During discussion at Committee in January 2020 on this, Members of the Committee were concerned by some of the comments and felt that a possible recommendation from the review could be around improving dialogue and discussion with young people.

Lewisham Interfaith Forum

- 8.8 The Steering Group for the Lewisham Interfaith Forum provided comments to the Committee via a written submission in December 2019. The full submission can be found below. The Steering group for the Lewisham Interfaith Forum includes representatives from the following faith groups: Buddhist; Christian; Hindu; Jewish; Muslim; Quaker; Unitarian.
- 8.9 When this was discussed at Committee in January 2020, members of the Committee commented that a possible recommendation from the Committee's review could be around more work and engagement and dialogue around some of the issues raised in the submission and that in particular there could be tensions between different equalities strands and it was important to engage with people on this.



The London Borough of Lewisham is a Borough where residents' equalities needs are generally understood and respected. There is plenty to celebrate in Lewisham with respect to equalities but there are still too often areas of discrimination, hate crime, abuse relating to Faith, Disability, Race, Gender and Sexuality.

Undoubtedly, more needs to be done in practical ways to educate Communities and Organisations. An example of such practice is the *LIF (Lewisham Interfaith Forum)* which proactively and passionately engages Communities through Events, Discussions, and sports, including as The Annual Peace Walk, Annual Mosque Open Day, Annual Holocaust Memorial Day, interfaith sports events, and other initiatives. The experience of *LIF* is that we can focus on what we share and what we hold in common across the religious spectrum so that *LIF* can be truly inclusive and respectful to all without anyone feeling they are censured, drowned out or unheard, or others feeling that they are made unsafe by uncharitable views. Everyone needs to be safe. Everyone matters. We have our differences but we try to bring those differences to the table and work together with respect and tolerance.

Although the Local Council actively takes into account Equalities in its Policy and Decision Making, at the same time it is important that there is more Engagement with Faith Groups/Leaders in the Borough to further understand and appreciate those long held values and sensibilities cherished by Faith Communities in a world of changing and melding opinions.

One example from among some members of *LIF* are that concerns and barriers to engagement have emerged not only from a faith perspective but also from a cultural perspective from communities across the faith traditions spectrum most currently concerning pressures to conform with LGBT opinions over the promotion of conservative religious traditions, where critical or dissenting opinions about LGBT may be tacitly or deliberately ignored, dismissed, drowned out, censured, and censored. For the continued wellbeing of any open democratic society, Lewisham Borough in this case, where opinions are aired and respected, it is critical that orthodox religious voices are not excluded from the dialogue. Faith communities will sometimes choose to differ vocally on opinions vis-a-vis LGBT, but they are not and should not be dismissed as backward, antiquated or repressive.

Another example, expressed by some of our members is the ongoing discrimination, hate crime and barriers to participation that are experienced by disabled members of our community. Disability equality should be a standard that all adhere to, but sadly this is not always the case in Lewisham.

Evidence of good practice is demonstrated by the work and willingness over the years of the *LIF*, the various ethnic communities in Lewisham, the network of the Police and the Council to cement a close-knit Lewisham community where residents have united to repel the far right marching on Lewisham Islamic Centre, the various peace vigils for continued peace and unity in Lewisham. These events and more, including countless personal testimonies, prove just how indispensable intercommunity dialogue and the work of the *LIF* has been in shaping current attitudes in Lewisham.

Lewisham Interfaith Forum Steering Group. Dec 2019

Metro Charity

- 8.10 Metro Charity provided two evidence submissions to the Committee for this review and also met with members of the Committee and attended a Committee meeting. Metro's full submissions are attached at Appendix 8. The Committee were very grateful to Metro for their comments and also for their suggestions which included looking at the London Borough of Sutton's Fairness Commission which the Committee incorporated as part of the evidence gathering for the review as outlined in section 7 above.
- 8.11 Some of the main comments by Metro echoed many of the concerns that members of the Committee had highlighted as the review progressed. This included:
- Importance of good data sources
 - The importance of a thorough and holistic understanding of community demographics including within groups.
 - Ensuring good equality monitoring
 - The lack of a borough-wide organisation representing disabled people
 - The importance of working with and learning from the voluntary and community sector
 - The importance of working in partnership with the voluntary and community sector.
 - Overcoming barriers to engagement and improving trust and support to ensure all groups can engage without fear.

Lewisham Disabled People's Commission

- 8.12 Jamie Hale, Chair of the Lewisham Disabled People's Commission presented to the Committee at their March meeting and provided information on the Commission's background and aims. The Commission was modelled on a very successful Disabled People's Commission in LB Hammersmith and Fulham.¹⁶ There was a very strong emphasis on the commission being collaborative and members of the Commission were keen to work with Councillors, Council employers, partners and the public. The main focus was to research and produce a report on the situation for disabled people in Lewisham including making recommendations for the Council to improve the lives for the disabled community in Lewisham.
- 8.13 The Commission was very keen to meet with anybody who felt their work overlapped to understand how they could work together whilst keeping a strong focus on the Commission's report. At the end of the Commission, it was hoped that the group would look into becoming at least an informal representative network of disabled people to help ensure that the voice of disabled residents was central to decision-making. The Commission was aiming for their final report to be ready late 2020 or early 2021.

¹⁶ LBHF Nothing About Disabled People Without Disabled People, November 2017
https://www.lbhf.gov.uk/sites/default/files/section_attachments/hf-disabled-peoples-commission-final-accessible-report-june-2018.pdf

- 8.14 Members of the Committee were keen to ensure that the Disabled People's Commission had the resources they needed to carry out their work and felt the findings of the Commission's report would be invaluable to the Council in improving understanding of the diverse issues faced by the disabled community in Lewisham and to improve the lives for the disabled community in Lewisham.

Summary of Section 8

- 8.13 The Committee were extremely grateful to community partners for engaging with the Committee's review and providing thoughts and insight as well as for the work they do for the Lewisham Community. The Committee's recommendations are shaped by all the evidence included in the report and members of the Committee were particularly keen to learn from the experiences, concerns and successes of partners within the borough that had been highlighted through the Committee's consultation process.

9 Conclusion

The Conclusion will be added to the final report after the Committee have made their recommendations.

10 Monitoring and ongoing scrutiny

The Committee expects to receive an update on the implementation of any agreed recommendations approximately six months after receiving the Mayoral response to this report.

List of Appendices:

- Appendix 1** Submission from Lewisham Council Directorates
- Appendix 2** New guidance on Equality Analysis Assessments in Lewisham
- Appendix 3** Presentations from Workshop on Equality Analysis Assessments
- Appendix 4** Presentations from Workshop on Equalities in the procurement & commissioning process.
- Appendix 5** Submission from the Local Government Association
- Appendix 6** Glasgow City Council – Equality Impact Assessments – Training, Screening Process; and Guidance.
- Appendix 7** Young Advisors Engagement write-up
- Appendix 8** Submission from Metro Charity.

Glossary of key terms

Term	Definition
Council for Voluntary Service	A Council for Voluntary Service (CVS) is a type of charity in England and it is the place where local voluntary and community organisations speak to each other and get support
Due regard	The Public Sector Equality Duty of the Equality Act 2010, sets out that in the discharge of their duties, public bodies must have due regard to the need to eliminate unlawful discrimination, foster good relations and promote opportunities for advancement for and between protected characteristics.
Disproportionality	The ratio between the percentages of persons in a particular racial or ethnic group experiencing an event (eg: imprisonment, school exclusions) compared to the percentage of the same racial or ethnic group in the overall population.
LGA	Local Government Association
EAA/EIA/EqIA	Equalities Analysis Assessment/ Equalities Impact Assessment
EFLG	The Equality Framework for Local Government
EHRC	Equalities and Human Rights Commission
Intersectionality	The interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group and the extent to which these connections result in an overlapping and interdependent systems of discrimination or disadvantage.
Marginalisation	A form of social exclusion whereby people or communities are relegated to the fringe of the communities within which they live.
Unconscious bias	Unconscious biases are social stereotypes about certain groups of people that individuals form outside their own conscious awareness.

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<http://www.assembly.wales/laid%20documents/cr-ld11793/cr-ld11793-e.pdf>

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Sutton Race Equality Scorecard, Runnymede Trust
<https://www.runnymedetrust.org/projects-and-publications/parliament/scorecard/sutton.html>

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APPENDIX 1

Key Equalities Issues for each Directorate

Safer Stronger Communities Select Committee requested that each Executive Director produce a summary for the Committee highlighting the key equalities issues facing the Directorate. This Appendix contains the response from each Directorate and was used by the Committee to help scope their review.

Community Services Directorate

1. This briefing summarises some of the main equality issues facing the Community Services Directorates. The briefing covers both policy issues as well as practical process management issues.
2. The Community Services Directorate supports the following services:
 - Adults social care
 - Public protection and safety
 - Public health
 - Culture and community development
 - Adults commissioning

Overview

3. A summary of key equalities issues that are impacting upon the Directorate are set out under the sub-headers below.

budget cuts

4. The impact of austerity has undoubtedly had the hardest impact on the most vulnerable households and most disadvantaged groups. Since 2011, the Council has reduced its revenue budget by some £160m. Limited resources mean that there is less to go around, with the inevitable consequence that those who are least equipped to help themselves face the most negative impact.

service users

5. Whilst the Directorate provides a range of services for the whole borough, it also provides services to specific groups such as vulnerable adults. In total there are some 3,500 adults aged 18 plus in receipt of social care services. In terms of adults social care one of the key equality issues and challenges is to promote independence for adults to and to ensure that where possible, they are able to live in their own homes. This specifically considers equality in its broadest sense i.e. the right to live independently regardless of health status rather than through the narrow confines of the equality act. This highlights an issue that runs throughout the Directorates consideration of the equality agenda namely that we tend to be driven by the stipulations of the Equality Act, and the defined protected characteristics, to the detriment of other considerations which may be equally pertinent in Lewisham e.g. socio-economic status.

Brexit

6. The implications of Brexit are still to be fully understood. However, it is accepted that the economic impact is likely to be negative. The Council is seeking to better understanding the numbers of impacted EU citizens in Lewisham, including those to whom the Council has a direct duty of care. This will ensure that we are able to target support more appropriately to those in the greatest need.

data capture

7. It is important to note that the provision of personal information is always discretionary and the Council has no right to mandate that anyone completing a survey or requiring access to a service should provide personal information. However, it is recognised that the Council could do better at making the case for collecting this data as it is a valuable source of evidence for strategy development, equality analysis assessment, service planning and for understanding the impact of budget decisions. An example of specific things that could be done to improve disclosure rates in surveys, undertaken by the Directorate include the following:
 - making specifically clear how personal (equalities) information will be used to improve services, develop services and improve customer experience
 - demonstrating how such information has been used effectively in the past to improve services, develop services and improve customer experience

robustness of equality analysis assessments

8. It is acknowledged that the quality and robustness of equality analysis assessments needs to be better. This is an organisation-wide challenge, not just one for Community Services. Part of challenge is that the variation of data needed to inform robust equality analysis assessment that provide, not just breadth across protected characteristics, but also depth in terms of understanding the complexity of those characteristics is not always available. The reason for this, is perhaps due to the fact that the rationale for collecting the data is not always clearly articulated and agreed from the outset.
9. The Directorate undertakes robust equalities analysis at the time of major changes or set piece activities e.g. the re-commissioning of a service/the re-letting of the grants programme but the day to day use of equalities data to develop and change service is less well developed. This is also the case for on-going analysis following a specific cut or re-organisation as the assessments tend to be 'snap-shots in time' rather than longitudinal studies. In addition the assessments are often focused on the specific, direct impact that a cut or change may have, rather than considering wider impacts across the council and/or community. This is in part a resources issue as the service development/monitoring function has suffered alongside all others in relation to budget cuts.

gaps in data breadth and depth

10. It is acknowledged that for some protected characteristics, data capture is better than others. For example, race, disability, gender and age are characteristics where there is better access to data. By contrast gender reassignment and sexual orientation are examples of protected characteristics where the volume and variability of data for analysis and decision-making is either limited or virtually non-existent.
11. It would be useful to know about instances where service users have accessed the Council through multiple points of entry (children's social care, adults' social care, housing, benefits etc). On a very practical level the routine sharing of that sort of information means that the Council can gain a more complete picture of a service user, where their needs reflect multiple- characteristics and support the process of service development. However, it is also invaluable to the extent that it prevents the need to double-count. To this end, the Council could explore this kind of equality data mapping and sharing as an area for development.
12. It should also be noted that attempts to improve the level of data capture can lead to un-intended and negative consequences e.g. recent attempts to improve the level of data on leisure centre visitors led to long queues at reception as data capture was undertaken.

Interface with wider community and services

13. The Directorate can sometimes struggle to fully understand where its role begins and ends in terms of addressing wider issues of inequality/disproportionality particular in times where budgets are very tight and the need to maintain a core service offer is the primary consideration.
14. This will include issues relating to wide ranging health inequalities or disproportionality within the criminal justice system where drivers and system interfaces are wide ranging and complex.
15. This is not to say these issues are not directly considered by services e.g. the Safer Lewisham Partnership board have focused on disproportionality in the CJS for 5 years and have a robust plan in place and review this issue regularly across the partnership focusing on "How do we understand and ensure negative bias is reflected upon and protected against" and have led work delivering unconscious bias training for all senior leaders across the partnership. There is also excellent data available in areas like Stop and Search and YOS where we are proactively looking at the data in respect of disproportionality and using it to question, challenge practice and take action but the question remains how far these positive interventions can address wider issues within society.

Customer Services Directorate

Introduction

16. This briefing summarises some of the main equality issues facing the Customer Services Directorate. The briefing covers policy and practical process management issues.

17. The Customer Services Directorate is comprised of the following service divisions:

- Housing
- Planning
- Regeneration
- Environment

Overview

18. A summary of key equalities issues that are impacting upon the Directorate are set out under the sub-headers below.

Borough demography

19. Lewisham is changing. This change is evident not just in terms of population growth, but also in terms of the diversity. By the time of the next Census in 2021, the population of the borough is forecast to reach 318,000. The impact of people living longer means that over time the population of over 65's is expected to increase. Lewisham is also likely to see a rise in the number of single person households (continuing the trend over previous Censuses). A further significant change will be the increase in the BAME population, which is expected to account for at least half of all Lewisham residents by 2021. The impact of the above present policy and service challenges for the Council, in terms of housing, area regeneration and demand for local services.

Budget cuts

20. Austerity has had a significant impact on the Directorate and the specific individuals and groups that it serves. Between 2010/11 and 2018/19, the Customer Services Directorate revenue budget has been reduced by £27.3m. The challenge for the Directorate is that the scope and scale of cuts is inevitably impacting on the most vulnerable groups and communities. Whilst the Directorate will always look to mitigate negative impacts, where-ever we can, this has become increasingly difficult.

Service users

21. The Directorate provides services to some of the most vulnerable residents in the borough such as older people, the disabled and homeless families. Currently there are just over 2,189 households living in temporary accommodation, of which about 2,000 are households with children.
22. By working alongside housing developers and through its wider planning and regeneration role, the Directorate seeks to increase the number of affordable homes in the borough. The issue of housing affordability is significant in the broader context of socio-economic equality (the average household income in Lewisham is below that of London). The Directorate has also recognised the need to develop housing solutions that meet the needs of other groups such as those of LGBT and older residents.
23. In addition to the above, the Directorate is supporting the Syrian Refugee Programme. To date, some 17 families have been accommodated in the borough through the programme. Our target is to welcome 100 families in total by 2022.

Brexit

24. In common with other parts of the Council, the Customer Services Directorate is gearing up for the impact of Brexit. Some of the issues that we are monitoring very closely include:
 - numbers of EU national presenting as homeless at our Housing Options Centre,
 - numbers of EEA nationals accessing the private rented sector who may have less knowledge about housing rights
 - reluctance of Landlords to rent to EEA nationals due to lack of legal clarity, which could result in approaches to the council and possible obligations on us to provide housing

Data capture

25. The Directorate undertakes a wide-range of public consultations that are consistent with our programme of strategy and service development. As part of this, we routinely ask that consultees complete a diversity questionnaire so that we can better understand the implications of our proposals on them. It is important to note that the provision of personal information is always discretionary and the Council has no right to mandate that anyone completing a survey or requiring access to a service should provide personal information. However, it is recognised that we could do better at making the case for collecting this information. This is an area that the Directorate is working on with corporate colleagues.

Gaps in data breadth and depth

26. It is acknowledged that for some protected characteristics, the availability of data is more plentiful than for others. For example, race, disability, gender, pregnancy & maternity and age are characteristics where there is better access to data. By contrast

gender reassignment and sexual orientation are examples of protected characteristics where the volume and variability of data for analysis and decision-making is limited. Whilst the Directorate is keen to ensure that it captures relevant data, we are also mindful of the need to ensure that the case for data collection is based on a sound business case, rather than collection for collection sake.

assessing residents with multiple characteristics

27. As a Directorate, we are taking active steps to ensure that we have the most complete understanding of 'multiple characteristics' in assessing the needs of residents who approach the Council for help. For example in housing; knowledge of an applicant's age, disability and maternity status help us to better assess their eligibility for services. Going forward, we are keen to develop this approach including through the use of smart software and data matching to predict growth in service demand and, where possible, to improve the timeliness of service interventions.

robustness of equality analysis assessments

28. In the performance of its role, the Customer Services Directorate collects a wide range of data. In some instances, data is collected through routine assessment for service eligibility, whilst in other instances it is obtained in response to consultations, complaints and other interactions with the public. However, it is acknowledged that the quality and robustness of equality analysis assessments could be further improved upon. Part of the challenge is that the variation of data needed to inform robust equality analysis assessment in terms of breadth across protected characteristics as well as depth in terms of understanding the complexity of impact, is not always readily available. The reason for this, is perhaps due to the fact that the rationale for collecting the data is not always made clear.

oversight of directorate management

29. The Directorate Management Team, continues to keep its approach to equalities under review. This is necessary to ensure that our approach is both consistent and sufficiently nuanced to reflect the specific and individual needs of each service area. The ongoing programme of work, which is being overseen by the Executive Director for Customer Services, will continue.

Children and Young People's Directorate

Introduction

30. This briefing summarises some of the main equality issues facing the Children and Young People's Directorate. The briefing covers both policy challenges as well as what we understand to be some of the practical and process management issues.
31. The Children and Young People's Directorate is comprised of the following service divisions:
- Children's Social Care
 - Joint Commissioning and Early Help
 - Education

Overview

32. A summary of equality issues being addressed by the Children and Young People's Directorate are set out under the various sub-headers below.

understanding the changing borough demographics

33. About a quarter of Lewisham's 301,000 population is comprised on children and young people aged 0-19. In terms of ethnicity, whilst 46 per cent of the borough's general population are of BAME heritage, this rises to 68 per cent for children in care and 76 per cent for the borough's schools population. There are also more than 170 languages spoken by children attending Lewisham schools.
34. About a third of the borough's children live in poverty, with 'income deprivation affecting children' particularly pronounced in Evelyn, Bellingham and Downham. Between 2014 and 2019, Lewisham has seen a 60 per cent increase the number of children and young people issued with an Education Health and Care Plan (as a result of their Special Educational Need/ Disability).

impact of budget cuts on services for children and young people

35. Public sector austerity has had a significant impact on the services provided in the Children and Young People's Directorate. Between 2010/11 to 2018/19, the Directorate has seen its budget reduced by 30%. The Directorate, is also impacted by cuts to the various support services upon which the Directorate relies and the austerity impacts on partners such as police and health.
36. Whilst it is recognised that the burden of spending cuts must be borne by the entire organisation, the challenge of delivering savings, whilst at the same time protecting the borough's most vulnerable residents presents an even greater challenge. The fact that

in 2017/18 more than 90 per cent of Councils, nationally, overspent their children's social care budgets underlines the above point.

Service need and demand

37. Set out below is a summary of service need and demand issues for services operating within the directorate:

- **Ensuring the right provision at the right time and of the right quality to young people with special educational needs and disabilities (SEND).** Provision in Lewisham is good but demand is rising (Ref: SEND Strategy 2016-2019). A new strategy to be agreed by December 2019
- **Ensuring access of BME children and young people and economically disadvantaged to mental health services.** Under-representation in services, long waiting lists for some services (Ref: CAMHS Transformation Plan Member led and NHS Improvement Recommendations All Age BAME Mental Health Equality Audit)
- **Improving school attainment of Black Caribbean pupils and White Free School Meals pupils.** Nationally, these are the lowest attaining groups – mirrored in Lewisham. (Ref: Report to CYP Select Committee, March 2019 and BME attainment strategy to CYP Select Committee and M&C September 2019)
- **Understanding ethnic breakdown of children and young people at different points in the children's social care system.** Pattern differs between ethnic groups at the stages of the child safeguarding process. Further analysis is planned.
- **Tackling overrepresentation of Black Caribbean pupils in permanent school exclusions.** As in other London boroughs, there is over-representation of Black Caribbean pupils in those permanently excluded, lining up with overrepresentation in criminal justice system. This is being addressed through the Inclusion Strategy (Ref: Review by CYP Select Committee reported 12th June 2019)
- **Increasing BME representation in senior management in schools.** Data is not good but this issue has been identified as a priority by Lewisham Learning, the school-led school improvement partnership.
- **Increasing the numbers of BME governors.** Data collection undertaken spring 2019 to establish baseline. (Ref: Report to CYP Select in September 2019)
- **Reducing childhood obesity which disproportionately affects BME and disadvantaged groups.** Rates for obesity and excess weight in Reception are the lowest recorded and now lower than England. A reduction in obesity prevalence for the fourth consecutive year was also seen in Year 6, but remains significantly higher than England. Rates higher in BME children and in the most deprived wards (Ref: Whole Systems Obesity action plan 2019-21. Reports to WSO project board)

- **Ensuring disadvantaged 2 year olds access free early years provision** – accessing early years provision improves the life chances of children and improves parents access to work. Lewisham has increased take up by 12% to 64% (Ref: Early Years Strategy).

Brexit

38. The Directorate is represented on the Council's Brexit Working Group. For children and young people, one of the major challenges is to ensure that the Council fulfils its role, as a Corporate Parent, to assist children and young people currently in care and those who have left care (who are EU nationals) to apply for Settled Status if they so wish. It should be noted that the Directorate is already taking active steps to address this issue.

data analysis

39. The Directorate holds a wide range of equalities data across protected characteristics. The data is collected across the range of services provided by the Directorate and provides it with a critical view through which to better understand the impact of its actions upon children and young people living in the borough. However, an area where services in the Directorate could be more effective is with regard to data analysis. The main constraint here is the limited capacity available at service or corporate level that can be devoted to this activity.

robustness of systems and processes

40. The Children and Young People's Directorate is the business systems owner of the Liquid Logic Children's Casework System. The system is the primary tool used by Children's Social Care to manage records for children and young people who come to the attention of the local authority. The variants of information held on the system include demographic data eg: age, ethnicity, gender, race and disability. Currently there is a major programme of transformation that that will deliver the end-to-end reconfiguration of the system and improve data recording on the system. This in turn will also improve both data recording, reliability and social work practice.

externally commissioned services

41. The Directorate commissions a wide range of services from external providers. These services are crucial in terms of meeting the needs of vulnerable children and young people in the borough. As part of the Early Help Strategy, the Directorate is strengthening the consistency in our approach to data gathering from service providers.

Resources Directorate

Introduction

42. This briefing summarises some of the main equality issues facing the Resources Directorate. The briefing covers both policy and practical process management issues.

43. The Resources Directorate is comprised of the following service divisions:

- Public Services
- ICT and Digital Services
- Corporate Resources
- Financial Services

Chief Executive direct reports, who attend Resources Directorate Management Team

- Strategy and Communications
- Policy and Governance
- Human Resources
- Legal Services

Overview

44. Although Resources is comprised almost exclusively of back office service areas, there are a significant number of equality issues affecting the Directorate. A summary of these issues are set out under the sub-headers below.

Understanding the changing borough demographics

45. There are significant issues here for support services in terms of helping frontline service areas to ensure that the Council continues to meet the needs of our diverse borough, whether that be in terms of strategic planning, or establishing the corporate approach to promoting equality and fairness in the provision of services and performance of functions. This is mainly addressed through the business planning and performance reporting frameworks the Council operates.

Impact of budget cuts on support services and financial monitoring

46. Public sector austerity continues to impact on the most vulnerable households and disadvantaged groups in the borough. The Council has sought to protect frontline service areas from the worst of the cuts programme. In order to do so the Resources Directorate has, as a proportion of its budget, borne the greatest burden of spending

cuts with more to come. Between 2010/11 and 2018/19, the Resources Directorate has seen its revenue budget reduced by £30.8m.

47. However, the reduction in support service spend is not without consequence for the Council. This is because limited back office capacity (whether in terms of ICT support, workforce development, strategic planning or data analysis) has a negative impact on the ability of services to function effectively.
48. In terms of process, the impact of budget savings proposals is assessed as part of the consideration of equalities in all cuts proposals, presented to Members for pre-scrutiny before Mayor & Cabinet decision. If agreed, services are then responsible for completing and monitoring the equalities impact as cuts are implemented.

Brexit

49. The Division is actively involved in co-ordinating the Council's response to the implications of Brexit on Lewisham. The Director of Policy and Governance chairs the cross-directorate Brexit Working Group and liaises with London as the Council's designated Single Point of Contact. The Director of Public Services chairs the Lewisham Resilience Planning and co-ordinates both emergency and business continuity planning across the Council. The effective performance of this function is crucial if the Council is to be able to ensure continuity of service, particularly for the most vulnerable residents and protect cohesion in borough from those who would want to foment community tensions.

Public facing services supported by the directorate

50. Public Services is the only resident-facing Division in the Directorate. The Division performs a wide range of functions with significant equalities implications including the collection of revenues and the award of benefits to vulnerable residents. The service also provides a first point of contact to the residents of the borough.
51. In addition, the Division manages the Council's information requests and complaints service and parking service. Equalities are considered when making any changes to these services, whether imposed by central government policy change or through service enhancements (e.g. technology).

Digitalisation of public facing services

52. The impact of spending cuts has seen a number of customer facing services move from face-to-face channels to online. Whilst such an approach has been necessary to generate cost savings, there remains the risk that communities who are at risk of digital exclusion such as the elderly, street homeless and others without ready access to ICT could become marginalised. There is a work to do here to follow-through the impact of

decisions to 'channel shift' both in the past and ensure that we carefully consider proposals to do so again in the future.

Corporate assurance

53. The Resources Directorate performs a number of functions across the organisation that are geared towards corporate assurance in the area of equalities. For example, the work of Human Resources ensures rigour and fairness in the recruitment process, monitors the diversity of the Council's work force, collects data on issues such as the gender pay gap and supports employee engagement such as through the LGBT and Disability forums. The wealth of data collected by the Human Resources Division forms the basis of an annual employment report presented to Members each July.
54. As part of the Directorate's corporate health and safety role, we co-ordinate work-place accessibility assessments, to ensure that reasonable adjustments can be made to the equipment used by Council staff. This is a key equality role and responsibility not least because it is part of the Council's broader duty of care responsibility for its employees.
55. The corporate audit function helps takes a helicopter view of the discharge of all Council functions and services to ensure that they are compliant with policy standards and holds services to account for addressing areas for improvement.
56. Through the exercise of the corporate performance management function, the Resources Directorate produces a suite of reports for services across the Council. The data contained in these reports supports services in adults and children's social care and is necessary to inform management action and safeguard the well-being of vulnerable service users. The Directorate has also been leading on a wide-ranging programme of data quality management.
57. Legal Services provides advice to services across the organisation, with specialist and helps to ensure that decision are consistent with legislation and regulation, in particular where this relates to Children's, Health & Social Care, Equality and Human Rights legislation. Legal Services also review and comment on equalities as part of the legal implications in all written decision reports, whether to Mayor & Cabinet or delegated to officers. In addition, the Director of Law delivers an equality briefing to senior managers to ensure that they understand their roles and responsibilities under the law.
58. In terms of business governance on equalities agenda, the Resources Directorate convenes the cross-directorate Corporate Equalities Board. The Board, which is chaired by the Executive Director for Community Services, oversees the programme of work as it relates to service and employee-related equality issues.
59. However, it is recognised that more can and should be done to enhance the way in which services operating within the Resources Directorate discharge their roles and functions. In particular, the extent to which all services discharge those functions through the prism of equalities, rather than with equalities as a broader contextual consideration.

Data capture

60. With the unrelenting pace of public sector austerity, the need for reliable equality data to inform decision-making has never been more important. The Council needs to satisfy itself that decisions regarding redesign or targeting of services do not unreasonably impact specific groups or communities and that, where such impacts have been identified, consideration is given to mitigating actions. The Resources Directorate recognises that there is more work to do here in terms of relationship-building with colleagues across the organisation to establish even more effective ways of working as it relates to the capturing equalities data.

Robustness of systems and processes

61. The Resources Directorate has the lead role in developing the Council's strategic and policy framework on equalities. However, it is also recognised that the purpose and focus of strategy and policy should not simply be to establish standards, it should be to effect ways of working. In this regard, there is a greater role for business governance, whether that be at directorate, service or corporate level in ensuring that business standards are exemplified through custom and practice. To ensure that this happens the Directorate continues to work on improving its approach to governance and oversight.

Gaps in data breadth and depth

62. It is acknowledged that for some protected characteristics, data capture is better than for others. For example, race, disability, gender and age are characteristics where this information is more readily available (subject people being willing to declare). By contrast gender reassignment and sexual orientation are examples of protected characteristics where the volume and variability of data for analysis and decision-making is limited.

Guidance on when is it necessary to carry out an Equality Analysis Assessment (EAA) **– circulated to the Safer Stronger Communities Select Committee January 2020**

Introduction

Equalities implications are an essential consideration in every report. By virtue of the public sector equality duty (PSED), the Council must have due regard to the need to:

- eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities.

This means that the Council has a legal duty to consider the implications of anything it does on the basis of people's protected characteristics as set out in the Equality Act 2010. The nine protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Being pregnant or on maternity leave
- Race
- Religion or belief
- Sex
- Sexual Orientation

When is an EAA needed?

A formal EAA is sometimes needed and sometimes is not needed. Whether an EAA is needed or not will depend on various issues. An EAA needs to be completed where:

1. the likely impact of the particular policy or activity that relates to events, practices and decision-making processes is identifiable,
2. the relevance of the impact identified to any protected group is established and
3. it is proportionate to complete an EAA.

In some cases it may be difficult to judge the relevance of a particular policy or activity on equality. There then needs to be consideration as to whether it is proportionate to complete a formal EAA, and if so, to what scale. To determine the relevance and proportionality of an EAA there are a number of considerations to be taken into account including:

- not just the number of service-users, employees or the wider community affected, but the significance of the impact of protected characteristic groups;
- the extent to which it is likely to have a differential impact on people with particular protected characteristics;

- whether it is likely to have a disproportionate impact on a protected characteristic group and could there be other reasons for the disproportionate impact;
- Is it a major policy or activity, significantly affecting how functions or objectives are delivered?
- Will the policy or activity have a significant impact on how other organisations operate in terms of equality?
- Does the policy or activity impact on issues that been identified through engagement as being important to people with particular protected characteristics (and not necessarily their views on the differential impact)?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any of the Council's equality objectives?ⁱ

Where an EAA is completed it provides good evidence that correct processes have been followed in regards to the PSED. In other cases where a formal EAA is not necessary, there should be a record of the reasons why the proposed policy, practice or activity is not relevant to equality, or why it is not proportionate to carry out a formal EAA and what, if any, other steps are to be taken.

Procurement

In relation to procurement, the Corporate Guidance on Reporting (updated in January 2020) provides that in the Equality Implications section of a procurement report, the impacts of the decision on different groups with protected characteristics and appropriate mitigations need to be considered. It goes on to state that whether a formal EAA is needed depends of the nature and scale of the impact(s) of the procurement matter on equality.

The guidance provided above fleshes out when is it relevant and proportionate to complete an EAA.

Where a formal EAA is not necessary

There are cases where there may be little or no evidence of the potential disadvantage on protected characteristic groups. This may due to the policy or activity having no particular relevance to the PSED. A record of these reasons should be made.

Summary

In light of the principles of relevance and proportionality as explained above, judgement should be made that is reliable as possible as to whether to complete a formal EAA, what

should be the scale of the EAA be (as to what extent should it breakdown people with protected characteristics), and whether it is necessary to carry out engagement activities with the affected groups, and monitor and review the particular policy, practice or activity. Obtaining more evidence can be valuable and key in demonstrating that the PSED is met, but only if it is proportionate and relevant.

As best practice, officers are encouraged to consider the potential equality implications of every project, task or service they are responsible for. However legal officers provide further advice as outlined in this note as to whether a full and formal EAA is required.

ⁱ The list of considerations is non-exhaustive and is taken from the EHRC Guidance of Meeting the Equality Duty in Policy and Decision-Making, October 2014

Safer Stronger Communities Select Committee

Review of equalities: Achilles Street Estate Regeneration

James Masini | Principal Development and Land Manager
James Ringwood | Senior Development and Land Manager

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Building for Lewisham

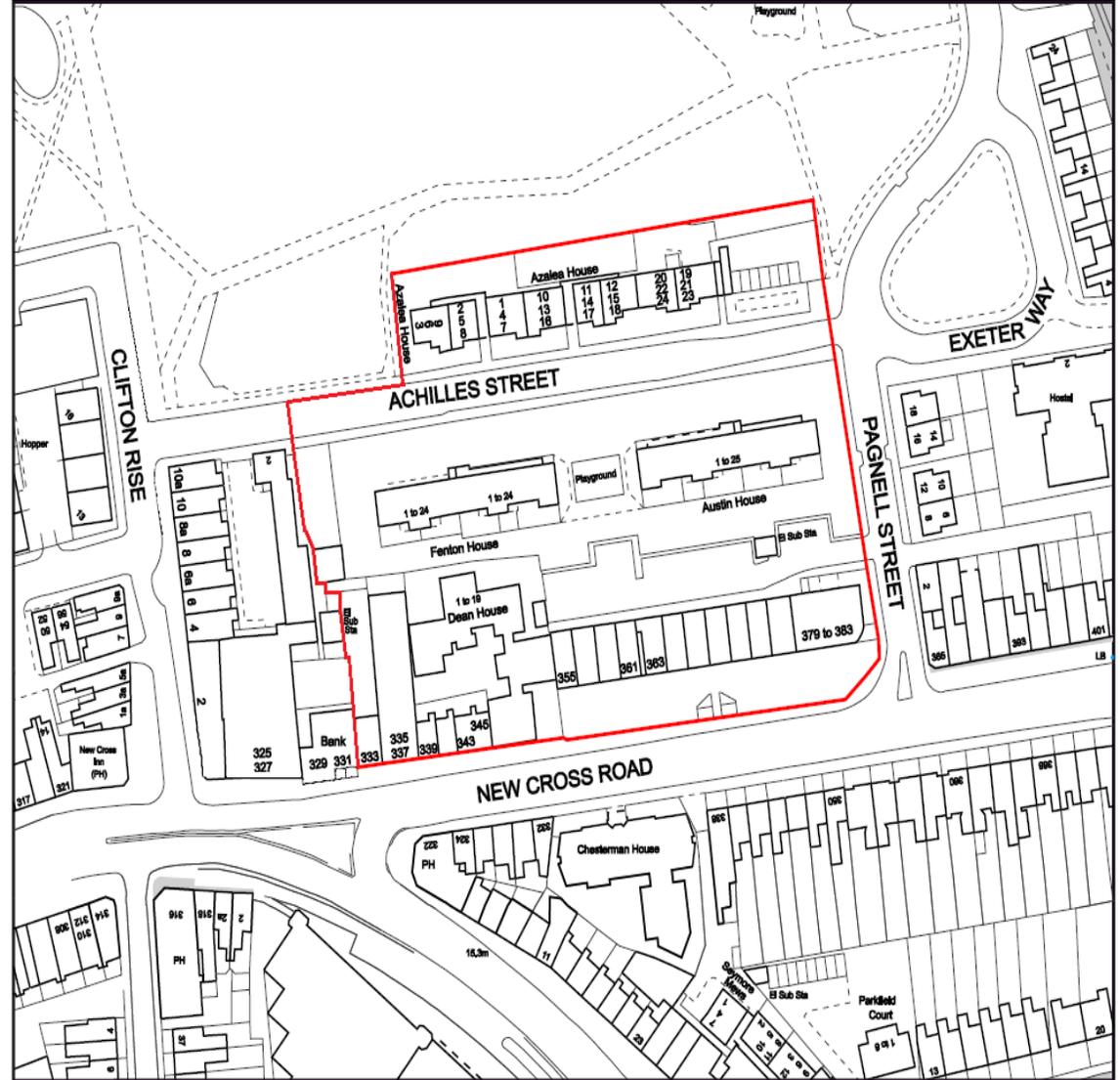
Lewisham Council are delivering 1000 new genuinely affordable rented homes

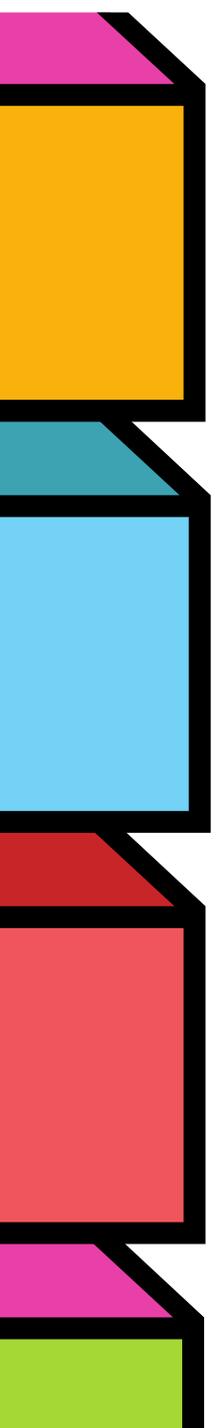
- Working with our development partners, the Council will deliver 1,000 new genuinely affordable homes
- Rents will be set at London Affordable Rent levels or lower
- The Council is working with our development agent, Lewisham Homes, to deliver the new Council-owned homes
- Delivery is through infill, acquisitions and estate regeneration
- Corporate and political commitments to both the delivery of new homes and ballots on all estates where demolition of existing homes is proposed

Achilles Street Estate Regeneration

Site

■ Tenants	54
■ Leaseholders	33
■ Total Homes	87



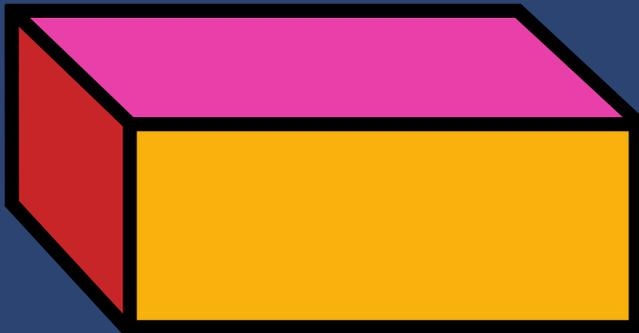


Achilles Street Estate Regeneration

Background

- Initial plans were developed in 2013 for infill on a garage site, providing around 20 units
- Consultation raised issues around the condition of the current blocks such as severe damp, poor security, infestations, parking and safety
- A review of the project led to estate regeneration being considered as the best option to significantly increase the amount of new homes whilst also improving conditions for current residents
- In 2015, KCA (Karakusevic Carson Architects) were appointed to work on a masterplan
- Snap General Election in 2017, planned local elections and emerging plans for resident ballots caused a pause in work
- June 2018, the Council announced the intention to hold a resident ballot on the estate

Resident engagement



Resident engagement during initial design development

- Residents have been consulted with consistently through the design development process:

Thursday 4 Feb 2016	1st Event, looking at likes and dislikes of current estate
Wednesday 17 Feb 2016	Follow up door knocking to see residents in their homes
Saturday 21 May 2016	2nd Event, early re-development proposals shared
Saturday 5 Nov 2016	3 rd Event, proposals reshaped in response to feedback
Saturday 25 Feb 2017	4 th Event, more developed proposals with potential views
Wednesday & Thursday 14-15 Mar 2017	Home visits to all residents to get detailed feedback

- The KCA designs were used to inform the Landlord Offer for the ballot
- However, we did not want the ballot to be about the designs. It was about the residents

Building trust with residents on a 1-to-1 basis

- We converted a vacant office into a community hub. This was used for weekly drop-ins but also available for the community to use on other days free of charge
- Officers spoke with every council tenant and resident leaseholder on the estate
- Light touch housing assessments gave us a greater insight into residents' needs
- Logging views in order to form the Landlord Offer and to gauge support for regeneration



Data collection





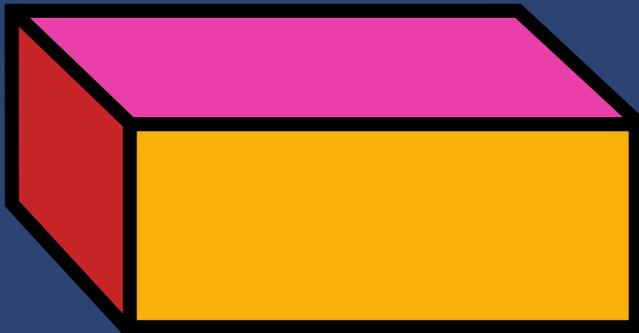
Historical data

- The Housing service have a good record of collecting and analysing data
 - Tenancy information and housing applications being the main sources
- The data collected through housing applications was used for the EAA table on Housing Register
- Housing Live (the main housing management database) was used for information on Achilles residents

Data collected on Achilles Residents

- Working closely 'on the ground' with residents allowed officers to collect and record more information to ensure that every resident was able to take part in the ballot
- Bespoke approach to continued engagement including information in different languages, home visits, assisting with housing management issues (rent arrears, repairs, rehousing)
- During the ballot itself, we ensured that we had a range of voting methods

Landlord Offer and Equalities





Offer to current residents

- The Council wants to ensure that current residents are not negatively impacted by the development
- All current residents entitled to an offer of a new home
- Rent will remain the same (for same size property)
- Shared Equity offer to resident leaseholders

Offer to new residents

- New home at a social rent
- Offer of a home that meets their assessed need (size and accessibility)



Equalities issues

Provision of accessible homes

- Current buildings either no lift or lifts too small for a wheelchair/buggy
- New homes will meet accessibility standards and will include new wheelchair standard homes
- Lifetime homes that can be adapted to fit individuals changing needs

Affordability

- Current residents not having to pay more for a same size new build as a result of the move
- New tenants still pay a genuinely affordable social rent - set at LAR level - allows for more homes to be built with a net positive impact on the Housing Register
- New homes built to modern standards resulting in more efficient and therefore cheaper running costs.

Overcrowding

- More genuinely affordable homes will have a positive impact on the residents on the Housing Register who are assessed as overcrowded
- Current residents will be offered a home that meets their needs

EAA approach – Seven stages

■ ***The project or decision that assessment***

- Significant increase of new social rented homes on the Achilles Street Estate

■ ***Protected characteristics or other factors potentially impacted by decision***

- All characteristics were considered – household type, income and disability main focus

■ ***The evidence to support the analysis***

- Housing databases were interrogated for both current residents and potential future residents

■ ***The analysis***

- Analysis of each equalities factors was carried out with a net positive or negative impact reported where data was available

■ ***Impact summary***

- Short, easy to read assessment of the analysis was provided

■ ***Mitigation***

- The delivery of this project will have a net positive impact on 5 of the equalities factors. Further work needed in the future on data collection for factors where little or no information held.

■ ***Service user journey***

- The benefit to both current residents and prospective residents are outlined.

Questions?

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Safer Stronger Communities Select Committee Review of equalities: Sanctuary Borough opportunities and challenges

- We want every resident to trust us and our services
- We want every officer to understand how their work is equalities work
- We want every decision to be grounded in insight from residents
- We want every pound spent to have the greatest impact possible
- We want every interaction with the Council to be empowering for residents

These equality aims also reflect the intention of all the work relating to sanctuary. Sanctuary is about safeguarding and promoting the welfare of asylum seekers, refugees and migrants much as the work of the council is safeguarding and promoting the welfare of all our residents.

This all links to our Public Sector Equality Duty to:

- eliminate unlawful discrimination;
- advance equality of opportunity between people who share a protected characteristic and those who don't; and
- foster or encourage good relations between people who share a protected characteristic and those who don't.

The EAA approach has seven stages to take officers through the process of evaluating impacts, planning mitigation and contextualising the decision in the wider council landscape. For the Sanctuary Strategy the EAA process is summarised below and on the following slides:

1. Project or decision assessment is for

The sanctuary strategy, and the framework within it. The SSCSC and M&C input points were noted for clarity on decision making.

2. Protected characteristics or other equalities factors potentially impacted

All protected characteristics plus migration experience, language, household type, income and carer status were identified as relevant due to the intersectionality we know those seeking sanctuary have.

3. Evidence to support the analysis

The evidence section normally sees the data sources outlined and explanation of why particular data was chosen. For this EAA, this set out the lack of data available and as a proxy set out limited related information and qualitative or anecdotal findings.

4. Analysis

This section sees the analysis applied to the data sources identified in Step 3. Given the lack of data, the analysis here is tentative and related to the anecdotal evidence. It also uses the lack of evidence as evidence in itself.

5. Impact summary

The impact summary is limited in the same way as the analysis due to the absence of the thread which should run from Step 1 to Step 5 – it was positive, but with that caveat.

6. Mitigation

Mitigation here addresses the data failure rather than negative impacts of the proposed strategy – it notes the need to improve our evidence base. It also acknowledges the potential risk of unintended consequences related to perceived unfairness of a sanctuary agenda and proposes the equality focussed approach as mitigation.

7. Service user journey

This aims to contextualise any single analysis in the wider council's work. In this case, improvements for residents more widely are likely to be felt as a result of any sanctuary work and most if not all services will be impacted as this is a corporate priority.

- It is clear from the process that the data is key and it will often be difficult in a new work area, where there isn't a historic evidence base, to evidence against equality impacts. In this instance, the mitigation for this is to use what is available anecdotally, and to use the lack of data as evidence in itself.
- It is essential that where the data is lacking that this is acknowledged, and that it becomes part of the action arising from the EAA itself. It may be worth including a requirement to state clearly the confidence level of any impact conclusions, to contextualise those which are based on weaker data or supposition.
- Lack of data should not be a barrier to any consideration of equalities - where there isn't the best evidence available, it's still essential that the process is followed and that decision makers are made aware of any limitations.
- Sanctuary also presents additional challenges i.e. the particular implications of disclosing immigration status, mistrust of government from conflict contexts which may make obtaining data more difficult.

- It is clear that there is huge value in this approach for thematic issues, and the inclusion of additional types of marginalisation beyond the protected characteristics can add value and unlock new perspectives.
- Work on sanctuary raises the profile of parts of the community which had previously been less visible and encourages more active consideration of the needs of these individuals.
- Sanctuary is about equality and raises the profile of equalities work, offering new perspectives and improved understanding of intersectionality, while wider equalities work provides opportunities to improve the experiences of those seeking sanctuary along with other marginalised groups – to this end the approach has been equalities focussed and will be embedded through existing corporate and equalities mechanisms.
- An equality approach also grounds the sanctuary work in mitigation of marginalisation and celebration of diversity rather than promotion of one group of residents over any other.

- Services need to start collecting data that provides insights into refugees, asylum seekers and migrants where it is relevant to their work and decisions.
- As part of the framework in the strategy, all services will be developing action plans for their sanctuary commitment and will be supported by a central officer to build their understanding and hold them to account for delivery.
- Corporate mechanisms are being used to embed sanctuary across our work, with inclusion in service planning templates, monitoring sections in consultation, in equalities tools and templates and through reporting of the council's action plans into the Corporate Equalities Board and Executive Management Team.
- Any future decisions within services relating to those seeking sanctuary should have their own EAA (or equivalent evaluation of possible impacts dependent on scale) and the expectation will be that these will be based on more robust data, collected locally for the purposes of that service's delivery, which will improve the borough-wide picture.

Next steps





Safer Stronger Select Committee:

Session on equalities in the design of commissioned and procured goods, works or services

30 January 2020

Katharine Nidd – Strategic Procurement & Commercial Services Manager

Iain McDiarmid - Service Group Manager – Prevention, Inclusion and Public Health Commissioning

James Lee - Director of Strategy, Partnerships & Improvement, Director of Culture and Community Development

Briefing overview

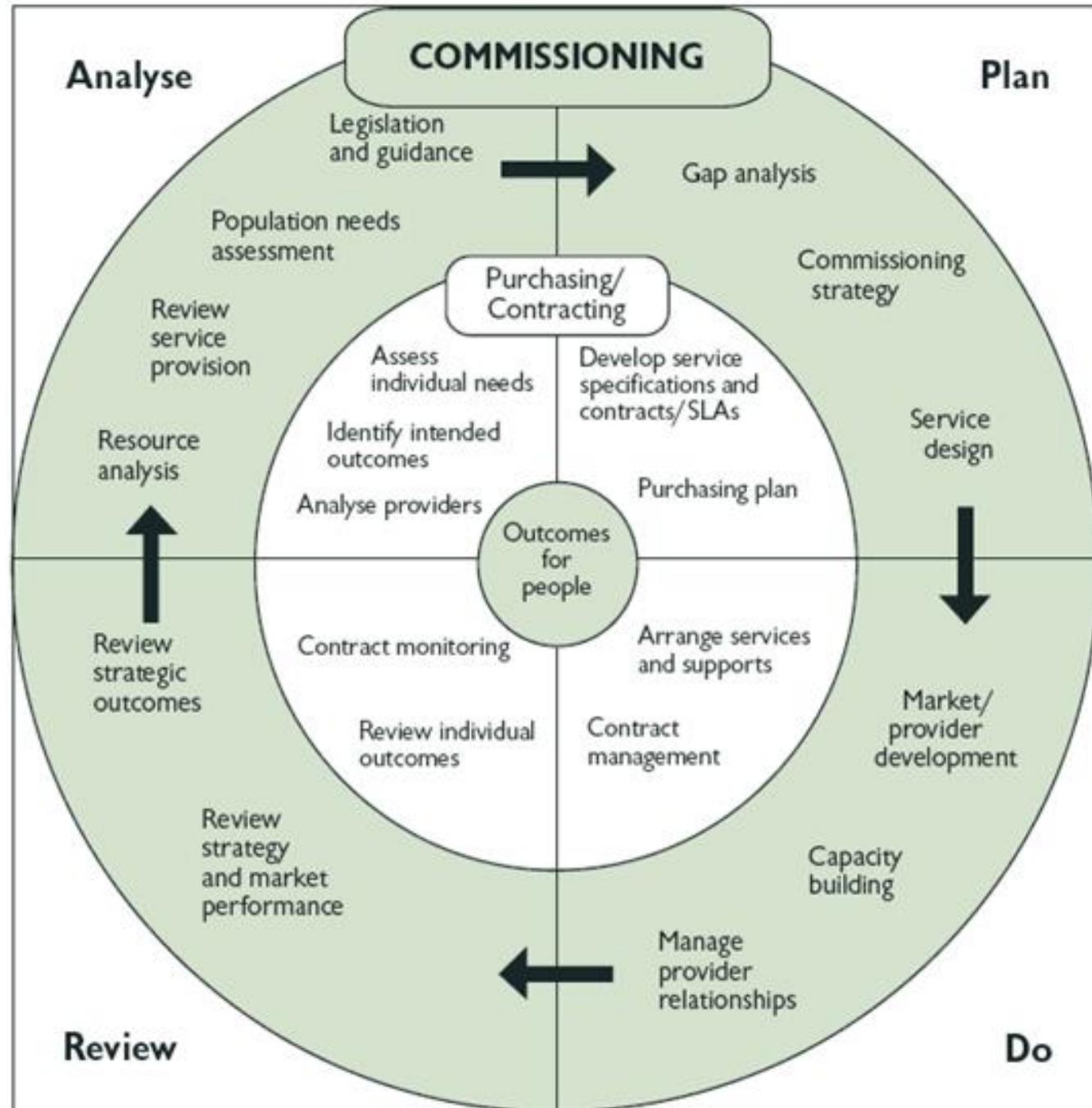


- The commissioning lifecycle
- The governance framework within which the Council procures
- Tender preparation and equalities considerations.
- ‘Deep dive’ examples:
 - stop smoking services;
 - sexual health promotion; and
 - obesity services (linked to the physical activity strategy).
- Q&A.

Commissioning cycle

Commissioning is a multi-faceted process **consisting** of a range of activities that run both in sequence and concurrently to ensure that all services are delivering the highest quality provision at the most cost effective price.

This is usually represented as a 'commissioning cycle' which demonstrates that the work in understanding need/demand as well as monitoring performance and redesigning services are continuous and linked during the contractual period.



Internal Governance



The processes that officers must follow are clearly set out in the following documents:

- Lewisham Procurement Handbook
- Contract Procurement Rules 2015 and LBL Constitution
- Scheme of Delegation
- Officers Code of Conduct

The Corporate Procurement Team are responsible for:

- Procurement Policy
- Gateway Processes
- Advice and compliance
- Portal and contracts register
- Training
- Link into the commissioning teams (Integrated Joint Commissioning Group)

Internal Governance



In addition to the EU regulations which must be followed, the Council has 3 main categories of procurement based on total contract value:

Category C	Category B	Category A
A quotes process can be used: < £10k 2 quotes £10k - £25k 3 quotes £25k - £50k 4 quotes	Contracts value > £50k < £500k for services and < £1m for works. Approval to procure and contract award made by Executive Directors. Tender process must be used, and if over OJEU, then this must follow the EU regs.	Contracts value > £500k for services and >£1m for works. Approval to procure and contract award made by Mayor and Cabinet. Tender process must be used, and this will most likely be above the OJEU threshold, and therefore follow the EU regs.

Procurement Lifecycle



For all procurements in excess of £200k* the following procurement lifecycle MUST be followed:

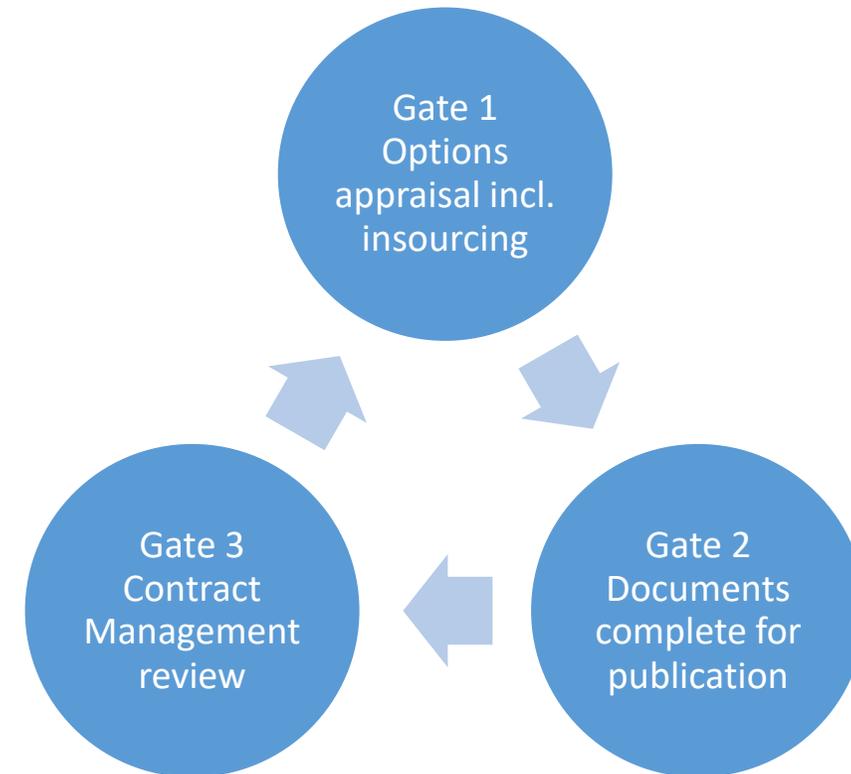
*NOTE: these are then offered to post scrutiny

Gate 1: Corporate priorities addressed:

- Equalities;
- modern slavery;
- Social value
- Insourcing (bus case developed and options appraisal)
- Service priorities (criteria and route to market)

Gate 2: decision compliance confirmation

Gate 3: monitoring (scrutiny)



Tender preparation & evaluation



Key documents

- Invitation To Tender
- Specification*
- Form of Tender
- Method Statement Questions*
- Pricing schedule
- Terms & Conditions*
- Social Value Monitoring Tool*
- TUPE template (where applicable)
- Bond of Guarantee/ Parent Guarantee/ Pensions

Must be cleared by Procurement & Legal **(Gate 2)**

*Equality and Diversity must be clearly considered and reflected here

Method statement questions



- These Method Statement's Questions below are what we use as a base template;
 - Experience & Capability
 - Service Delivery
 - Project Management / Mobilisation
 - Communication
 - Continuous Improvement
 - **Equalities, Diversity and Inclusion**
 - Health & Safety
 - Social Value

Stop smoking service



- ❑ Co-design with provider (Lewisham and Greenwich Trust) and Lewisham Public Health experts as part of funding reductions of c. 25% between 2015 and 2017
- ❑ Equalities analysis as part of Public Health grants cuts for April 2017
- ❑ Recommissioned building on the above in 2018
- ❑ Today service fundamentally targeted on inequalities- 50% of KPIs on targeting inequalities

Targeting & Equality KPIs	No. of successful pregnant women 4 week quits	50 (5% of total number of quits)
	No. of successful mental health 4 week quits	150 (15% of total number of quits)
	No of successful 4 week quits with a long term condition	500 (50% of total number of quits)
	No. of successful 4 week quits from parents of asthmatic children	20 (2% of overall quits, inclusive of all groups of smokers)
	No. of successful 4 week quits from lowest SES which includes smokers coded as: <ul style="list-style-type: none"> • Unemployed • Retired • Long term sick • Routine & Manual Workers 	600 (60% of overall quits, inclusive of all groups of smokers)

Sexual health promotion



- ❑ Driven by the 2019 refresh of Lambeth, Southwark and Lewisham's joint sexual health strategy:
<https://lewisham.gov.uk/mayorandcouncil/aboutthecouncil/strategies/sexual-and-reproductive-health-strategy>
- ❑ Review of existing provision for sexual health promotion, and whether it delivered as well as possible against those inequalities identified in the strategy
- ❑ Service redesign and subsequent recommissioning into three specialist elements – Black African/Caribbean service (just awarded to Brook-led group including Naz and Stephen Lawrence trust) and for MSM the recommissioning of the London HIV Prevention Programme and separately a specialist 'chemsex' service to focus on developing mainstream provision (antidote)

Obesity services (linked to Physical Activity Strategy)



- ❑ The Council was due to recommission obesity services for 2020, broadly configured into weight management and community prevention services.
- ❑ Through consultation with stakeholders and the market warming, officers were challenged on whether this service configuration addressed health inequalities and the level of insight from affected communities.
- ❑ In response to these challenges and to opportunities presented, including emerging work under the Health and wellbeing board on BAME health inequalities, Mayor & Cabinet agreed to delay tender processes.
- ❑ Officers are currently conducting an 'expression of interest' process to fund community groups to undertake insight work, overseen by a working group including BME network. Please see attached the call for expressions of interest that has been launched.

Questions & Answers



Submission for Lewisham Scrutiny and Equality Commission

1. Introduction

The Equality Standard for Local Government was established in 2001 by the Improvement and Development Agency (IDeA). Its purpose was to set a benchmark and enable councils to self-assess and improve their approach to equality. In 2009, the IDeA revised this, and soon after launched the Equality Framework for Local Government (the EFLG) which took a less bureaucratic approach. The LGA regularly revises the EFLG, with involvement of local government personnel to take account of changing society and legislation. It aims to be a supportive self-assessment tool for councils, to help them become more aware of their own achievements and areas for improvement. If the council chooses to have an external validation by an LGA peer challenge, the EFLG forms a large part of the evidence for that peer challenge.

The most recent revision was 2019. The EFLG (2019) has been updated to reflect the latest legislation affecting equality such as Gender Pay Gap reporting, GDPR, the changing context of the local government sector and equality in Britain and in response to other significant issues that might affect equality including the UK's decision to leave the European Union.

2. Aim of the EFLG:

The equality framework is intended to help Councils:

- deliver accessible and responsive services to customers and residents in their communities including those from protected characteristics
- employ a workforce that reflects the diversity of the area they are serving
- provide equality of opportunity for all staff
- Meet the requirements of the Public Sector Equality Duty

It seeks to do this by:

- Identifying the areas of activity that Councils need to be addressed to deliver good equality outcomes
- Helping Councils to understand how they can build equality into processes and practices
- supporting organisations to become inclusive employers
- Enabling Councils to informally self-assess their progress on the equality improvement journey and determine where and how they need to improve.
- Providing the framework for an LGA Equality peer challenge

3. Underlying Principles

- The EFLG is part of the LGA's sector led improvement offer to the local government sector and as such engagement with the Framework is voluntary.
- The Framework can help with compliance with the Public Sector Equality Duty which is a legal obligation of the Equality Act 2010.
- The Framework references the nine legally protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also encourages Councils to consider other issues that might be affecting their staff such as caring responsibilities as well issues affecting communities such as socio-economic inequality and isolation including rural isolation
- The EFLG is supportive of the EHRC's six selected domains of equality measurement which it has identified as the areas of life that are important to people and that enable them to flourish. They are: Education, Work, Living standards, Health, Justice and personal security, and Participation
- The modular design of the Framework reflects the fact that Councils come in all shapes and sizes with different resources, communities and priorities. It recognises that action on all equality issues at once is not always possible.
- The Framework supports the LGA's Equality Peer Challenge

4. Structure of the EFLG

The Framework sets out four modules for improvement underpinned by a range of criteria and practical guidance that can help a Council plan, implement and deliver real equality outcomes for employees and the community. The four modules are:

- Understanding and working with your community
- Leadership and Organisational Commitment
- Responsive Services and Customer Care
- Diverse and Engaged Workforce

For each module there are three Levels. Developing; Achieving and Excellent. The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities. Councils can be at different levels of the framework for different modules.

Developing - The developing level criteria contain the basic building blocks for each priority. An organisation at the Developing level has made an organisational commitment to improving equality. It is putting in place processes to deliver on equality issues and is working towards meeting and exceeding the statutory requirements.

Achieving - An organisation at the Achieving level has policies, processes and procedures in place and is delivering some good equality outcomes. It is not only meeting but can demonstrate exceeding statutory requirements.

Excellent - An organisation at the Excellent level has mainstreamed equality throughout the organisation and can demonstrate that it is delivering significant outcomes across its services that are making a difference in its communities. The organisation not only exceeds statutory requirements and it is an exemplar council for equality and diversity in the local government and wider public sector.

The modules contain several themes, each with short descriptor at each level of the framework. This is followed by a set of indicators or criteria that can be used to self-assess.

5. Good Practice examples from recent LGA equality peer challenges

LB Croydon – Awarded Achieving November 2019

There is a visually diverse leadership team

There is a clear link on E&D from governing party's manifesto to corporate plan and Cabinet responsibilities. Progress on E&D strategy and objectives is monitored at a Member's equality and diversity oversight group.

There are Member champions for Autism, mental health, dementia and BAME and LGBT.

The borough has declared itself a "White Ribbon" borough to highlight the issue of Domestic Violence. The Leader is a White Ribbon ambassador.

There are 6 staff equality networks. Each has a sponsor and a budget of £1500 per annum for projects.

Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace.

Socio- Economic Equality actions

Localities based approach uses data to tailor services to the most vulnerable in the borough.

Procurement and commissioning is used effectively to deliver equality outcomes. Contracts in excess of £100,000 are assessed with equality metrics. Service providers are required to collect equality monitoring data and provide equality training to their staff.

Council supports the VCS deliver food clubs not food banks to reduce stigma

There is targeted leadership development for BAME and women employees which has already started to see results. There is a commitment to diverse recruitment panels and LBC is working with neighbouring councils to achieve this.

The organisation is Level 2 of “Disability Confident” It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter.

The Council has a low gender pay gap of 1.6%. It goes beyond the pay gap legal requirements to also measure disability and ethnicity pay gaps.

Wolverhampton Council – Awarded Excellent Autumn 2018

The Council’s “WV Insight” website gives staff and the public access to information and data sets developed from several sources including the Office of National Statistics, Public Health and the Joint Strategic Needs Assessment (JSNA). The data is aligned to the Equality Framework for Local Government. It enables users to drill down to consider trends and compare CWC to its near neighbour councils and conduct gap analyses on equality criteria.

All elected Members receive annual equality training and on induction.

There is a Members Equality Advisory Group (EAG) with a very good knowledge of their communities & local issues. EAG has a diverse makeup in terms of gender and ethnicity. Members of the group are trained on the WV Insight tool to help them to understand the emerging trends and changes within their communities.

The Council has taken some bold initiatives that impact beyond the local authority area e.g. the Paulette Wilson Windrush Migrants Initiative. The project is named after a Wolverhampton resident who was detained as part of the scandal. CWC developed a project with the city’s Refugee and Migrant Centre to assist and support those who came from the Commonwealth prior to 1973 and who may be affected or worried about their immigration status. It provided one-year funding for the project and its launch on the 9 May 2018.

Each service produces an annual service equality action plan and has a service equality group and an equality champion. Performance on service equality plans is reported through the relevant governance processes and presented to the Members group.

The Council has set up a Community Reference Group which acts as community moderators in the event of critical incidents of gang crime. Members of the group include community leaders, third sector organisations as well as parents of victims and perpetrators.

There are four well-established staff equality forums (Race, Gender, Disability and LGBTQ) which have clear structures and regular meetings. These are open to all staff in the council and have memberships from across the organisation. Forums are recognised as a source of innovation and good ideas (for example the Maternity and Disability Buddy Schemes, and the need for Unconscious Bias training).

Socio Economic Equality Actions

“Wolves at Work” uses data to identify and target key groups. In this case to receive support around employability.

CWC offers more of its contracts to local SMEs rather than national organisations as a result of its policy of breaking down contracts into smaller lots by area. An example is the Advocacy contract which was increased from 2 lots to 5. Outcomes of contracts are analysed by protected characteristics. Questions on social value are included in tender questions and social value (with a focus on equality) is used to

The Council supports a Parental Ambassadors scheme which provides opportunities for the better integration of migrants. The scheme is recognised as best practice at a national level. It offers an accredited training course in becoming a community ambassador to parents newly arrived in the City. Twenty newly arrived migrant parents who were unemployed have qualified from this course and a number have found employment in Wolverhampton schools. They are providing daily interpretation and other key support to newly arrived children with additional language requirements. The scheme has had positive outcomes for both education and employment.

A range of actions have been introduced over the past two years to address lack of workforce representation at senior levels. These include having diverse selection panels; introducing mandatory unconscious bias training for all staff involved in selection decisions including members; requiring recruitment agencies to produce diverse shortlists; having anonymised applications for all posts; giving guaranteed interviews for all disabled applicants meeting the vacancy criteria.

Manchester City Council – Re-accredited at Excellent June 2018

The Council’s collaboration with partners is enriching its knowledge and enabling it to gain a deeper understanding of residents. An example of this is its work with higher education institutions to generate an ethnographic study of Manchester and an external study of the Health and Wellbeing system. Another example is the preparation work being done for the new Local Care Organisation. (LCO) Data is being provided by a range of partners including police, fire, the ambulance service and housing providers. Mental Health Trusts are also involved.

Member Equality Champions were strongly committed to driving change for each of the protected characteristics.

The Council has very strong relationships with the local LGBT community. A strong strategic partnership and engagement framework exists between the council and the LGBT Foundation.

The Ward Improvement Partnerships intervene early to tackle cohesion issues, focusing on the problem (such as fly tipping) rather than different communities blaming each other.

Extra care for Lesbian, Gay, Bi-Sexual and Transgender (LGBT) elder residents is available as part of an effort to improve residential care delivery for this protected characteristic group. The provision was designed with input from an LGBT elder reference group.

Socio Economic Equality actions

The City Council has adopted Inclusive Growth as a very explicit goal to help ensure that all residents can benefit from the considerable economic growth of the last twenty years.

Since 2015 the Council has worked hard to increase the use of the Social Value Act to drive conversations with suppliers. It has increased the weighting given to social value considerations in the tendering process from 10% to 20%. Outcomes from this approach include suppliers creating 423 employment opportunities for hard to reach individuals, 705 apprenticeships and 1,160 jobs and nearly 69,000 hours of support to the VCS.

The Council pays the national Living Wage to all its staff including care staff. Staff can have up to three days paid leave to volunteer. Flexible working is promoted across the organisation and the Timewise Accreditation has been adopted.

Essex CC – Reaccredited at Excellent June 2018

Essex Innovates is a partnership between the County Council, the police and Essex University. It has created a data platform with the vision of making Essex national leaders in using the power of data science and Artificial Intelligence to tackle public policy challenges. The intention is that partners will implement data-driven solutions for prevention to benefit local people and businesses. Issues on the ground are already being tackled using predictive data analysis from the platform. e.g. domestic violence, and school readiness where district councils, ECC and police data is analysed to predict which families will need the greatest intervention.

ECC has worked with partners to develop and launch the first countywide Faith Covenant in Britain. The Covenant was signed in October 2017 by, amongst others, ECC, Basildon, Braintree, Chelmsford and Colchester councils, Essex Police, the Office of the Police and Crime Commissioner and the Essex Fire Authority. The shared ambition is for Christians, Muslims, Hindus, Jews, Buddhists, Pagans and leaders from the public sector to pool their resources to strengthen community cohesion and tackle isolation and loneliness.

Accessible Meeting Hub – ECC sought to create a space where with people with a range of needs can be better supported during meetings or engagement work, as part of its drive to be Disability Confident. In Autumn 2017, the first floor of Chelmsford Library was identified as the most viable space for new 'accessible' meeting rooms.

The Council is doing some innovative work around preventing mental ill health. It funds a council based Mental Health and Wellbeing team of specialist social workers who do preventative work with people suffering from low level mental ill health.

Carer and disability passports are “owned” by the staff member and set out their issues and needs so that new managers can quickly appreciate their needs.

Socio-Economic Equality Actions

Ethnographic research is used to engage with hard to reach communities. E.g. at Jaywick in Tendring where intelligence was gathered by talking to residents. This is helping to determine where infrastructure changes can really help the community, for example the provision of shelters at bus stops for residents who use public transport to get to work. Research with the Children in Care Council also used observation and soft data to develop services.

The Meaningful Lives Project for autism and learning disability is funded for three years and works across health, employment and housing needs. The offer is firmly grounded by the people themselves who are using the service telling the council what they need in their lives. The project has enabled a programme for six adults at a time with learning disability and/or autism to be given paid internships within ECC for an eight-week period. The project is also approaching other potential employers such as police, fire and ambulance services about opportunities for people with a learning disability or autism.

London Borough of Hackney Re-accredited at Excellent April 2018

There are Member Champions for equality

Community engagement is well resourced. There is an independent facilitator for the community planning panel and other social cohesion groups. Different faith groups meet via the Faith Forum throughout the year working on different issues such as hate crime and welfare reform.

Examples of positive partnership working in practice: e.g. Volunteering for Hackney, the Faith Forum, reaching excluded communities, Improving Outcomes for Young Black Men, work in Hackney Museum, Integrated Communities.

Consultation is targeted appropriately, and the Council monitors which communities are harder to reach or engage with. Events are then held specifically to engage these communities. For example, Public Health targeted work with Muslim women. A fitness instructor in a hijab was engaged to provide fitness classes.

Although the Council is putting more services on line, it recognizes that there will always be certain people who are unable to use the internet due to disability, age or mental health issues. Its strategy is to help those who can, to interact on line, which will free up resources to work with the people who need face to face assistance. The I-Care Information Directory was tested by elderly users and those with mental health issues. User groups were able to go through the process with support where necessary.

The Council has recognized that tenants in the private rented sector also need support. It has set up a specific team set up to address health and wellbeing issues of private tenants.

The Pause Project supports women at risk of having their future children being taken into care. The programme which is now in its third cycle provides 18 months of support in every aspect of the women's lives. The approach was piloted in Hackney and it is now being adopted across the county.

Socio Economic Equality Actions

Work with Young Black Men –This project addresses the fact that many young black men have worse outcomes in terms of education, mental health, offending rates and employment than their peers in the community. The project is championed by the Council's Deputy Mayor Lead Cabinet Member for Children and Young People. It is a multi – agency partnership that seeks to improve the life chances of future generations of young black men and to provide support and opportunities for those now aged 18-25. Its next step are to secure resources to increase the level of community engagement, develop the leadership role of the youth advisory group of young black men who steer and shape the programme and deliver engagement.

There is a deliberate policy of taking some services and interventions out to the estates in the borough where there is particular need. Some residents are being prescribed exercise and fitness by GPs and the Council is responding by offering £1 fitness classes on some estates.

Rugby Borough Council Re-accredited at Excellent May 2017

Community Associations within the borough are proving to be a good source of community insight and intelligence. Issues around anti-social behaviour and gang culture have been identified and addressed in one area as a result of intelligence gained by the Association.

Member Champions for equality

The Council has good relationships with volunteers such as street pastors who are supporting vulnerable people across the town.

The Council has been bold in tackling the issue of child sexual exploitation by working with partners to provide training for hotels, bed and breakfasts and taxi drivers. All new taxi drivers are required to attend the training and then every three years as part of their licence conditions to ensure they are aware of their responsibilities in protecting their passengers.

Staff have access to a wide range of equality and diversity training. Refresher training is regularly available. Manual and customer service staff have had "theatre type" equality training. Some equality training is mandatory, such as for new staff in their induction training. All employees have had training around the Prevent agenda. Members training is also mandatory and should be undertaken every three years.

Socio -Economic Equality Actions

Leaders recognise the “socio-economic” challenges facing communities in Rugby that are at risk of exclusion. This is exemplified in the case studies relating to Homelessness and Universal Credit. RBC is the lead Council in the Homelessness Prevention Trailblazer pilot project across Warwickshire. The aim of the project is to trial new ways to prevent Homelessness at an earlier stage than other local authority models. In response to a growing need for support for vulnerable claimants of Universal Credit the Council has contracted with the Benn Partnership and the Citizens Advice bureau to provide advice and support on a cost per client basis

Other case studies

Available on the LGA website here: [LGA Equalities Case Studies](#)

EQUALITY IMPACT ASSESSMENT (EQIA): SCREENING FORM

Introduction to the EQIA screening process

A successful EQIA screening will look at 5 key areas:

1. **Identify the Policy, Project, Service Reform or Budget Option to be assessed**
A clear definition of what is being screened and its aims
2. **Gathering Evidence & Stakeholder Engagement**
Collect data to evidence the type of barriers people face to accessing services (research, consultations, complaints and/or consult with equality groups)
3. **Assessment & Differential Impacts**
Reaching an informed decision on whether or not there is a differential impact on equality groups, and at what level
4. **Outcomes, Action & Public Reporting**
Develop an action plan to make changes where a negative impact has been assessed. Ensure that both the assessment outcomes and the actions taken to address negative impacts are publically reported
5. **Monitoring, Evaluation & Review**
Stating how you will monitor and evaluate the **Policy, Project, Service Reform or Budget Option** to ensure that you are continuing to achieve the expected outcomes for all groups.

1. IDENTIFY THE POLICY, PROJECT, SERVICE REFORM OR BUDGET OPTION:

a) Name of the Policy, Project, Service Reform or Budget Option to be screened

b) Reason for Change in Policy or Policy Development

c) List main outcome focus and supporting activities of the Policy, Project, Service Reform or Budget Option

d) Name of officer completing assessment (signed and date)

e) Assessment Verified by (signed and date)

2. GATHERING EVIDENCE & STAKEHOLDER ENGAGEMENT

The best approach to find out if a policy, etc is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those groups. You should list below any data, consultations (previous relevant or future planned), or any relevant research or analysis that supports the Policy, Project, Service Reform or Budget Option being undertaken.

Please name any research, data, consultation or studies referred to for this assessment:	Please state if this reference refers to one or more of the protected characteristics: <ul style="list-style-type: none"> ➤ age ➤ disability, ➤ race and/or ethnicity, ➤ religion or belief (including lack of belief), ➤ gender, ➤ gender reassignment, ➤ sexual orientation ➤ marriage and civil partnership, ➤ pregnancy and maternity, 	Do you intend to set up your own consultation? If so, please list the main issues that you wish to address if the consultation is planned; or if consultation has been completed, please note the outcome(s) of consultation.

3. ASSESSMENT & DIFFERENTIAL IMPACTS

Use the table below to provide some **narrative** where you think the **Policy, Project, Service Reform or Budget Option** has either a positive impact (contributes to promoting equality or improving relations within an equality group) or a negative impact (could disadvantage them) and note the reason for the change in policy or the reason for policy development, based on the evidence you have collated.

Protected Characteristic	Specific Characteristics	Positive Impact (it could benefit an equality group)	Negative Impact – (it could disadvantage an equality group)	Socio Economic / Human Rights Impacts
SEX/ GENDER	Women			
	Men			
	Transgender			
RACE*	White			
<i>Further information on the breakdown below each of these headings, as per census, is available here. For example Asian includes Chinese, Pakistani and Indian etc</i>	Mixed or Multiple Ethnic Groups			
	Asian			
	African			
	Caribbean or Black			
	Other Ethnic Group			
DISABILITY	Physical disability			
<i>A definition of disability under the Equality Act 2010 is available here.</i>	Sensory Impairment (sight, hearing,)			
	Mental Health			
	Learning Disability			

EQIA Screening Form

LGBT	Lesbians			
	Gay Men			
	Bisexual			
AGE				
	Older People (60 +)			
	Younger People (16-25)			
	Children (0-16)			
MARRIAGE & CIVIL PARTNERSHIP				
	Women			
	Men			
	Lesbians			
	Gay Men			
PREGNANCY & MATERNITY				
	Women			
RELIGION & BELIEF**				
	See note A list of religions used in the census is available here .			

* For reasons of brevity race is not an exhaustive list, and therefore please feel free to augment the list above where appropriate; to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions used in the census is available [here](#).

Summary of Protected Characteristics Most Impacted

Summary of Socio Economic Impacts

Summary of Human Rights Impacts

4. OUTCOMES, ACTION & PUBLIC REPORTING

Screening Outcome	Yes /No Or / Not At This Stage
Was a significant level of negative impact arising from the project, policy or strategy identified?	
Does the project, policy or strategy require to be amended to have a positive impact?	
Does a Full Impact Assessment need to be undertaken?	

Actions: Next Steps

(i.e. is there a strategic group that can monitor any future actions)

Further Action Required/ Action To Be Undertaken	Lead Officer and/or Lead Strategic Group	Timescale for Resolution of Negative Impact (s) / Delivery of Positive Impact (s)

Public Reporting

All completed EQIA Screenings are required to be publically available on the [Council EQIA Webpage](#) once they have been signed off by the relevant manager, and/or Strategic, Policy, or Operational Group. (See [EQIA Guidance](#): Pgs. 11-12)

5. MONITORING OUTCOMES, EVALUATION & REVIEW

The Equalities Impact Assessment (EQIA) screening is not an end in itself but the start of a continuous monitoring and review process. The relevant Strategic, Policy, or Operational Group responsible for the delivery of the Policy, Project, Service Reform or Budget Option, is also responsible for monitoring and reviewing the EQIA Screening and any actions that may have been take to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from **Corporate Strategic Policy and Planning** will be available to provide support and guidance.

Legislation

Equality Act (2010) - the Equality Act 2010 (Specific Duties) Scotland Regulations 2012

The 2010 Act consolidated previous equalities legislation to protect people from discrimination on grounds of:

- race
- sex
- being a transsexual person (transsexuality is where someone has changed, is changing or has proposed changing their sex – called 'gender reassignment' in law)
- sexual orientation (whether being lesbian, gay, bisexual or heterosexual)
- disability (or because of something connected with their disability)
- religion or belief
- having just had a baby or being pregnant
- being married or in a civil partnership, and
- age.

Further information: [Equality Act Guidance](#)

As noted the Equality Act 2010 simplifies the current laws and puts them all together in one piece of legislation. In addition the **Specific Duties (Scotland Regulations 2012)** require local authorities to do the following to enable better performance of the general equality duty:

- report progress on mainstreaming the general equality duty
- publish equality outcomes and report progress in meeting those
- impact assess new or revised policies and practices as well as making arrangements to review existing policies and practices gather, use and publish employee information
- publish gender pay gap information and an equal pay statement
- consider adding equality award criteria and contract conditions in public procurement exercises.

Further information: [Understanding Scottish Specific Public Sector Equality Duties](#)

Fairer Scotland Duty

Authorities should also consider Socio-Economic Impacts where appropriate. Further information: [Fairer Scotland Duty Interim Guidance](#)

Enforcement

Judicial review of an authority can be taken by any person, including the Equality and Human Rights Commission (EHRC) or a group of people, with an interest, in respect of alleged failure to comply with the general equality duty. Only the EHRC can enforce the specific duties. A failure to comply with the specific duties may however be used as evidence of a failure to comply with the general duty.

Glasgow City Council

Equality Impact Assessment (EQIA) Guidance

July 2019

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Introduction

What is Equality Impact Assessment (EQIA)?

Most policies, projects, Service Reforms, or Budget Option have wider impacts beyond their intended outcomes, and may also impact differentially on different groups in the population.

The purpose of the EQIA is to ensure that decision makers are fully informed, at a formative stage in the decision-making process.

Identification of a potentially adverse impact does not mean that the option cannot be taken forward. However where there is a potentially adverse impact, measures should be identified that would minimise that impact should the option be approved. If an adverse impact could amount to unlawful discrimination, then adjustments should be made to avert this.

There is a statutory obligation to meet the Public Sector Equality Duty (PSED) in the Equality Act (2010) and the corresponding supplementary 'Specific Duties' contained within the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. (A summary of the Equality Legislation Requirements is provided as Appendix B) The legislation imposes duties on all Scottish Local Authorities with the express purpose of enabling the better performance of the PSED contained in s149 (1) of the Equality Act 2010. This requires Local Authorities to be proactive in promoting equality, eliminating unlawful conduct and fostering good relations.

The legislation requires that people are not discriminated against, harassed or victimised on the grounds of

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race,
- religion or belief (including lack of belief),
- sex,
- sexual orientation.

These are called '**protected characteristics**'. In exercising its functions a Local Authority must advance equality of opportunity between those who share a relevant protected characteristic and those who do not.

EQIA is one way to ensure public policies meet these legal requirements. Assessing the likely impact of our plans and services also makes good business sense for the Council, as it is important in developing any proposal to understand the needs of different population groups.

One of the main aims of the PSED is to improve transparency and accountability and this is also a priority for the Council when it comes to reporting on potential policy changes and other equality related issues.

Definition of policy

The general duty applies across everything an authority does. The legislation, together with this guidance, uses the term 'policy' for what is being assessed. Thus, 'policy' should be broadly understood to embrace a range of different types of functions including strategies, plans, services or proposals as well as provisions, criteria and practices. For example, setting budgets, developing high-level strategies, changing organisational practices such as internal restructuring or proposals for any of the above can be considered as 'policy'.

Other Key Areas to Consider:

Equality, socio-economic disadvantage and health

As well as equality considerations, Glasgow City Council (GCC) has committed to reducing health inequality and improving health outcomes. Importantly, we want to ensure that our policies and services meet the needs of population groups that are known to have poorer health and social outcomes.

The [Fairer Scotland Duty](#) places legal responsibility on particular public bodies in Scotland to pay due regard to (actively consider) how they can reduce inequalities of outcome, caused by socio-economic disadvantage, when making strategic decisions. [Interim Guidance on the Fairer Scotland Duty](#) has been published to give an idea of the areas of interest that can be explored when considering potential socio-economic impacts.

Among the key areas to consider are where these criteria might be more pronounced in in the area being considered:

- Socio economic background of individuals and communities
- Areas of low wealth (eg: prevalence of home ownership/ accumulation of savings etc)
- Material deprivation (how this links to low income)
- Area deprivation (how an area is reflected with SIMD and other indices of relative poverty. Also the relationships between how communities of interest (eg: disability prevalence/ ethnic composition etc) are impacted by poverty and communities of place (geographic factors – and how these can overlap)

Many of these areas, are of course, cross cutting; with regard to Health in particular. For example, access to employment opportunities, reliable transport, good quality housing and education and training will all have wider impacts on people's health and on health inequalities. GCC's revised approach to Equality Impact Assessment (EQIA) considers all of these issues and aims to identify monitor and report potential impacts on equality, diversity, health and health inequality.

Equality and Human Rights approach

A Human Rights approach should be an embedded consideration in all Equality Impact Assessment. In summary; we need to consider, where applicable, to what (if any) extent policies, projects, Service Reforms, or Budget Options impact on three key strands of Human Rights:

Absolute rights:

- the right to life,
- the right to freedom from inhuman and degrading treatment

Limited rights:

- the right to liberty,
- the right to a fair trial

Qualified rights

- the right to respect for private and family life, home and correspondence
- the right to freedom of thought, conscience and religion
- the right to freedom of assembly and association
- the right to protection of property

Any restriction of Qualified Rights must be:

- In accordance with the law: have a basis in domestic law, safeguards against arbitrary interference, foreseeable
- In pursuit of a legitimate aim: including "the economic wellbeing of the country"; "the protection of health", "protection of the rights and freedoms of others"
- Necessary
- Proportionate
- Not discriminatory

We would recommend the [FAIR](#) based approach when considering Human Rights in the Impact Assessment process:

As with all impact identification; it is important to note, that process of consideration is not limited to identifying those impacts we wish to improve or mitigate, but also where applicable, those **positive impacts** that may enhance the human rights of individual(s).

Please also see the [Scottish Human Rights Commission outline of human rights](#)

Who is responsible for doing an EQIA?

The group responsible for developing, reviewing or revising a policy, plan or service is also responsible for carrying out the EQIA. Support is available from GCC's Corporate Strategic Policy and Planning section; they are able to offer advice and support but will not do the assessment for you.

If there is already a project management or steering group developing the policy under considerations then this group (or a sub group) could serve as the steering group for the EQIA.

It is also essential to have a named responsible lead officer for the EQIA to deliver the assessment, recommendations and action planning if required.

Step 1. Identify the Policy, Project, Service Reform or Budget Option to be Impact Assessed

The first and most important part of the process is to describe and provide detail on the Project, Service Reform or Budget Option that is being assessed for equality impacts. It is important to describe its purpose, expected duration and outcome focus. This provides the context for what impacts are likely and what the intention of the policy is.

When should I carry out an EQIA?

In order to fulfil our general duty it is critical that the all services conduct an EQIA in the following circumstances:

- **All** significant policies, strategies and projects should have as a minimum an EQIA screening inbuilt as part of the risk assessment process.
- **All** budget options for the each financial year will require to be EQIA screened. (It is possible to group individual options if they relate to one particular service area)
- **All** Reports to Committee now require Equalities Impacts to be reported either as an EQIA (screening or full report) or as a status report on Equalities considerations.
- Significant service reforms **may** require a Full Report to be completed, or as a minimum, a justification in a Screening Report as to why the Full Report was unnecessary.

Once a decision is take to undertake an Impact there are two key types of EQIA.

- **Equality Impact Assessment Screening**

A screening can be undertaken as part of a scoping exercise prior to a full report, or it can stand alone as final summary if no significant Equalities Impacts are identified or arise subsequently in the policy or plan implementation

- **Equality Impact Assessment Full Report**

A full report should be conducted for a significant service reform, or where a Screening indicates an area or areas that require more detailed consideration.

For the purposes of the guidance the term **EQIA** refers to both Screening and Full Assessment unless otherwise stated.

Step 1- Project, Service Reform or Budget Option

It is crucial that the work involved should be documented on an ongoing basis so that the report is completed throughout the process rather than as an onerous task at the end. Well documented records will also be required in the event that a policy ever has to be objectively justified.

Project Initiation Document (PID)

All significant Projects will have their own **Project Initiation Document (PID)**. EQIA should be **embedded** as part of the overall **Risk Management Strategy**, and as such will necessarily be considered and documented at each decision point in the process.

Within every **Project Initiation Document (PID)** the information and stages below should be included.

Stage	Activities
Scoping	Step 1: Identify the Policy, Project, Service Reform or Budget Option (refer to EQIA Screening where appropriate)
Planning	Step 2: Gather Evidence Step 3. Assessment & Differential Impacts
Closing	Step 4 - Outcomes, Action & Public Reporting Step 5 - Monitor, Evaluate & Review

Should you require more information on project management you can complete the eLearning course on [GOLD](#)

Step 2. Gathering Evidence & Stakeholder Engagement

EQIA Evidence Matrix

EQIA recommendations need to be based on evidence of impact and relevance.

Policies will have already to some extent; be based on evidence. Before conducting an EQIA it is important to summarise the evidence that has informed the proposal to date. The new **EQIA Evidence Matrix** (below) provides a starting point for the consideration of the potential impacts by protected characteristic, cross referenced with some key areas where impacts might be discernable.

	<i>Age</i>	<i>Disability</i>	<i>Ethnicity</i>	<i>Gender</i>	<i>Religion</i>	<i>Sexual Orientation</i>	<i>Pregnancy & Maternity</i>	<i>Marriage & Civil Partnership</i>
General Info								
Access to services								
Poverty/low income								
Health								
Education								
Employment								
Discrimination								
Hate Crime/Safety								
Social Exclusion/Civic Engagement								
Economic Activity								

The link below connects directly to the live matrix:

[Equalities Impact Assessment Evidence Matrix](#)

Other Sources

The evidence matrix is intended **only to be a starting point** for consideration of any potential impacts on the equality groups defined within the key protected characteristics. The matrix above is not exhaustive and other sources should also be considered.

These might include further detail on the following:

- Data on populations in need
- Data on service uptake/ access
- Data on quality/ outcomes
- Research evidence/ literature review
- Findings from stakeholder consultation
- EQIAs on similar policies or EQIA's conducted by other authorities

Further guidance on Evidence Gathering

If you require further information on Evidence Gathering, Glasgow City Council has produced some guidance on potential tools for Evidence Gathering (based on the Equality and Human Rights approach). This is available at the link below.

[Further Guidance On Gathering Evidence](#)

It is not essential to follow the detail of all the approaches outlined in this additional guidance document, as some areas may be more relevant than others, however clearly some approaches will be very pertinent to evidence gathering.

This guidance also references the initiation of a **Scoping workshop**.

A **Scoping workshop/exercise** is merely a meeting or communication between relevant professionals to discuss the potential early stage impacts of a **Project, Service Reform or Budget Option**, and this can take any form of that is deemed appropriate

- A meeting
- Email and/or phone communication
- A focus group of professionals
- Any other communication between professionals intended to look at an early stage at potential impacts

Step 3. Assessment & Differential Impacts

There are two key stages in the Equalities Impact Assessment Process:

Stage 1: Screening

As noted above, a screening should ideally be carried out at the outset of a policy, service reform, or budget proposal in order to embed consideration of equalities at the earliest part of the project plan or process.

In order to complete an EQIA screening it is important to reflect on all the available strategic documents associated with the proposed policy, service reform, or budget change, and any early stage indications that the direction of any activity will have differential impacts on protected characteristics.

Where appropriate, it is also advisable to reflect evidence, in the form of reports, the result of consultations, external academic research, and in-house research to support the aims of the policy, service reform, or budget initiative.

This early stage work should highlight areas of interest covering the following:

- Positive and Negative impacts across all protected characteristics.
- An indication of the degree of potential impact, and whether this is judged to have a High, Medium or Low impact potential.
- It should also provide a guide to whether any impacts identified would could be mitigated by an amendment to the policy, budget or service reform proposal

After completing an EQIA screening exercise, it is important to conclude whether **more detailed work is required** to address any areas of significant concern. Or whether **no significant impact** has been identified

If **no significant impact** is identified by the screening report, a full impact assessment report does not need to be completed. However, it is important that a **review of the screening can be actioned at any time** through the appropriate strategic mechanisms associated with the policy, service reform, or budget change if unforeseen consequences arise or new information becomes available.

If significant negative impacts are identified, or areas of concern arise that require further investigation, the process moves to **Stage 2: Full Impact Assessment**

Stage 2: Full Impact Assessment

If there are any areas that arise as part of the screening process that require further investigation or highlight areas of concern with regard to likely impacts across any or all protected characteristics, then it is recommended that a full impact assessment report be conducted.

The primary structure of the Full Impact Assessment report should mirror precisely the key stages for conducting a screening report, and be structured under these key headings as follows.

- Identify the Policy, Project, Service Reform or Budget Option (refer to EQIA Screening where appropriate)
- Gathering Evidence & Stakeholder Engagement
- Assessment & Differential Impacts
- Outcomes, Action & Public Reporting
- Monitor, Evaluate & Review

Screening

It is expected that in most cases a Screening Report will have been conducted prior to a Full Assessment being required, and the findings of the report should inform the introduction to the report; and provide the context and background, to underpin the purpose and direction of the Full Impact Assessment.

Gathering Evidence & Stakeholder Engagement

Typically a Screening Report will refer to relevant consultations and established evidence where appropriate. As before, the evidence available via the Equalities Evidence matrix should be used as starting point to reflect on the potential impacts on the equality groups defined within the key protected characteristics.

Community engagement and consultation

A Full Impact assessment process may require a direct consultation and evidence gathering to be undertaken. This may in turn require engagement with Stakeholders and Service Users directly and/or those indirectly affected by the proposed policy, service reform, or budget change.

Proportionality

As explained earlier, the extent to which policies should be subject to impact assessment will depend on questions of relevance and proportionality as well as impact on equality of opportunity in respect of protected groups. Efforts should be

Step 3 – Assessment & Differential Impacts

concentrated on assessing to a greater extent the impact of functions which are most relevant to equality. A more detailed assessment may be needed if there is uncertainty, about which impacts are most significant and how, or if, the proposal should be adjusted.

Assessment and Differential Impacts

Using the Evidence Matrix, and all other appropriate and relevant sources, an assessment of likely impacts across the protected characteristics should emerge.

Key Questions to Address

The Assessment should highlight areas of interest covering the following:

- Positive and Negative impacts across all protected characteristics.
- Scale of the Impact: An indication of the degree of potential impact, and whether this is judged to have a High, Medium or Low impact potential.
- Anticipated duration of the impact if relevant
- Whether there is a specific differential impact to a particular protected characteristic or characteristics
- Or if the impact is more wide ranging and general in its effect.
- Whether any impacts identified would could be mitigated by an amendment to the policy, budget or service reform proposal

For Full Impact Assessment these areas should be considered in detail. Where other impact areas are identified that do not relate directly to the protected characteristics, these should also be recorded, as they may help to inform any wider Risk Assessment of the Policy, Project, Service Reform or Budget Option being considered.

Learning for future EQIAs

If as part of the Assessment and Evidence Gathering process additional evidence is gathered which is considered of potential use for future EQIA, this should be submitted to Corporate Policy: Strategic Policy Planning, so that it can be included as part of the Equality Evidence matrix if appropriate:

Equality@glasgow.gov.uk

This allows the Equalities Evidence matrix to remain responsive and relevant to Services.

Step 4. Outcomes, Action & Public Reporting

Outcomes

When the evidence has been considered in relation to the proposed Policy, Project, Service Reform or Budget Option, it will be apparent what the likely impacts are. The type, scale, duration, and specificity of the likely impacts will inform the direction of the outcome of the EQIA.

There are four potential outcomes as follows:

- 1. No major change required**
The Policy, Project, Service Reform or Budget Option is robust and can continue unamended
- 2. Continue the Policy, Project, Service Reform or Budget Option**
A justification is required for continuing despite the potential for adverse impact
- 3. Adjust or Amend the Policy, Project, Service Reform or Budget Option**
Remove barriers, make changes to better advance equality or remove or mitigate negative impact
- 4. Stop, or Remove the Policy, Project, Service Reform or Budget Option**
If adverse effects cannot be justified and cannot be mitigated.

Action Planning

In the case of the latter two outcomes noted above (3 & 4), an Action Plan should be developed to deliver specific outcomes that support the recommendations of the EQIA. Even in the case where the policy is to be continued (2), and mitigating action is being taken to address negative impact, an action plan will most likely require to be developed.

The Strategic or Planning Group overseeing the Policy, Project, Service Reform or Budget Option, has the responsibility for delivering the outcomes of the Action Plan. The Action Plan should be a standing item on the agenda of the Strategic or Planning Group until the Actions have been completed.

It also expected that a named individual(s) is assigned as lead(s) to complete the actions identified in the Action Plan. This allows for transparency and scrutiny when following up the outcomes of the EQIA.

Public Reporting

Public authorities are required by law to publish the results of any EQIA (Screenings and Full Assessments) in respect of an implemented policy within a reasonable

Step 4. Outcomes, Action & Public Reporting

period. Each Service Department is responsible for publishing any and all EQIAs undertaken by that Department on the Council public website and Intranet.

Corporate Policy will take responsibility for linking to these EQIA reports from its Public Performance Reporting section on the Glasgow City Council website.

Once the EQIA Screening or Full Assessment including the recommendations has been agreed by the appropriate Manager or the relevant Policy, Strategic or Operational Group, it should then be signed off by one or both before, prior to submission to Corporate Policy Strategic Policy and Planning, and publication on Council media.

The EQIA Final Full Assessment Report should be emailed to

Equality@glasgow.gov.uk

Presenting the evidence and making recommendations

For each of the impact areas prioritised summarise the impacts in terms of the protected characteristics affected and the likelihood and severity of the impact.

Recommendations should be based on evidence and aim to mitigate adverse impacts or enhance positive impacts.

If appropriate it may be possible to identify a preferred policy amendment option based on the evidence. The relevant Policy or Strategic Group should consider the EQIA and agree the recommendations to improve the policy. All decision making should be recorded.

Do I Need To Complete A Health Impact Assessment (HIA)?

GCC's approach to EQIA aims to identify any unintended equality or health impacts that may arise from a proposal. Health Impact Assessment (HIA) involves a more detailed assessment of equality, inequality of access to services, health and, in addition, human rights impacts.

For most proposals an EQIA should be all that is necessary to highlight the issues that will need to be addressed and no further assessment will be necessary.

In some cases, involving major strategies or plans, it may be decided that a full HIIA (including human rights impacts) will be required. Guidance and supporting documents for HIIA can be found here on Health Scotland's website at the following link:

[Health Impact Assessment Guidance](#)

Step 5. Monitor, Evaluate & Review

Reporting EQIA Findings and Recommendations

A brief summary of the findings of the EQIA, including recommendations and changes made, **must** be reported in any papers about the Policy, Project, Service Reform or Budget Option submitted to Glasgow City Council (GCC) formal committees or other decision making structures.

A copy of the EQIA Screening, or Full EQIA which has been undertaken should also be included in the papers for detailed scrutiny.

Monitoring, Evaluation and Review

There will almost certainly be a range of actions that arise from the impact assessment. It is recommended that EQIA recommendations and actions required are **reviewed** after six months if possible and **as a minimum after 12 months**. EQIA review dates should be built into the mainstream Project Management process and the person who owns the policy or strategy should enter the review date in his or her diary to ensure that actions are followed up.

As noted above, it is recommended as a minimum that the Strategic or Planning Group overseeing the Policy, Project, Service Reform or Budget Option, should retain the responsibility for driving the any **Action Planning** resulting from the Impact Assessment and for responding to any issues (unforeseen or otherwise) that arise as a result of policy implementation.

It is also advisable that there is named lead that can monitor, and evaluate and review the progress of any Equality Impacts identified in the Assessment. This person may be contacted by a member of the GCC Corporate Policy for quality control or monitoring purposes to see what the eventual outcomes of your actions were.

Changes required to policy and future monitoring and evaluation

The EQIA should be completed in time to inform policy development and implementation.

The impact assessment is likely to raise questions about how the policy will impact on different groups once implemented. This will require monitoring of policy outcomes for each protected characteristic. Monitoring of these equality impacts should be mainstreamed into evaluation of the policy, through the Action Planning process as noted above.

Recommendations for future monitoring of the policy should focus on issues raised by the impact assessment such as:

- Whether the recommendations of the impact assessment are implemented

Step 5. Monitor, Evaluate and Review

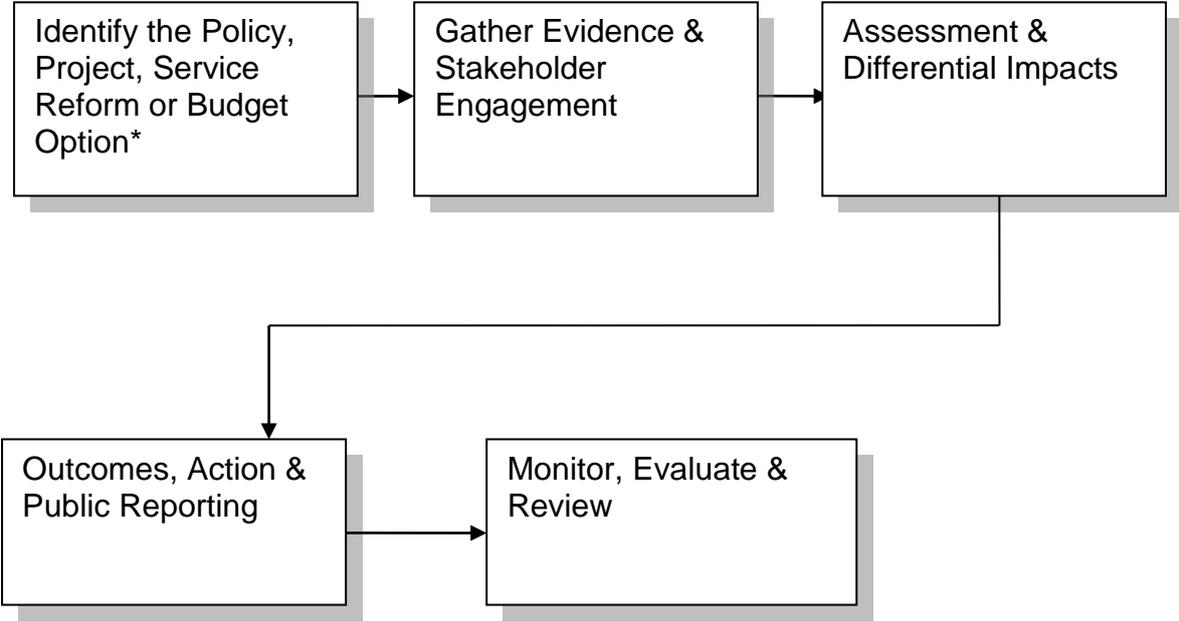
- Outcomes of policy on different protected characteristics using routinely collected equality data to do this
- If the impact assessment has identified gaps in evidence, you might want to recommend action to fill these gaps. This may involve new research or improvements to routine data systems to provide better data.

When monitoring the EQIA Full Assessment outcomes, please detail any recommendations and note (as in the previous section) where an Action Plan has been developed to progress any outcomes relating to the protected characteristics, and report on the delivery of any of the actions supporting the outcome of the EQIA.

Quality Assurance

Periodically, the Corporate Policy Strategic Policy and Planning Team will meet to assess the standard to which EQIAs have been completed. A sample of EQIAs will be reviewed against quality criteria, and against the Equality Impact Assessment guidance.

Equality Impact Assessment (EQIA) Process



* Refer to any previous EQIA Screening when Full EQIA being undertaken

EQUALITY IMPACT ASSESSMENT (EQIA): SCREENING FORM

Introduction to the EQIA screening process

A successful EQIA screening will look at 5 key areas:

1. **Identify the Policy, Project, Service Reform or Budget Option to be assessed**

A clear definition of what is being screened and its aims

2. **Gathering Evidence & Stakeholder Engagement**

Collect data to evidence the type of barriers people face to accessing services (research, consultations, complaints and/or consult with equality groups)

3. **Assessment & Differential Impacts**

Reaching an informed decision on whether or not there is a differential impact on equality groups, and at what level

4. **Outcomes, Action & Public Reporting**

Develop an action plan to make changes where a negative impact has been assessed. Ensure that both the assessment outcomes and the actions taken to address negative impacts are publically reported

5. **Monitoring, Evaluation & Review**

Stating how you will monitor and evaluate the **Policy, Project, Service Reform or Budget Option** to ensure that you are continuing to achieve the expected outcomes for all groups.

1. IDENTIFY THE POLICY, PROJECT, SERVICE REFORM OR BUDGET OPTION:

a) Name of the Policy, Project, Service Reform or Budget Option to be screened

b) Reason for Change in Policy or Policy Development

c) List main outcome focus and supporting activities of the Policy, Project, Service Reform or Budget Option

d) Name of officer completing assessment (signed and date)

e) Assessment Verified by (signed and date)

2. GATHERING EVIDENCE & STAKEHOLDER ENGAGEMENT

The best approach to find out if a policy, etc is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those groups. You should list below any data, consultations (previous relevant or future planned), or any relevant research or analysis that supports the Policy, Project, Service Reform or Budget Option being undertaken.

Please name any research, data, consultation or studies referred to for this assessment:	Please state if this reference refers to one or more of the protected characteristics: <ul style="list-style-type: none"> ➤ age ➤ disability, ➤ race and/or ethnicity, ➤ religion or belief (including lack of belief), ➤ gender, ➤ gender reassignment, ➤ sexual orientation ➤ marriage and civil partnership, ➤ pregnancy and maternity, 	Do you intend to set up your own consultation? If so, please list the main issues that you wish to address if the consultation is planned; or if consultation has been completed, please note the outcome(s) of consultation.

3. ASSESSMENT & DIFFERENTIAL IMPACTS

Use the table below to provide some **narrative** where you think the **Policy, Project, Service Reform or Budget Option** has either a positive impact (contributes to promoting equality or improving relations within an equality group) or a negative impact (could disadvantage them) and note the reason for the change in policy or the reason for policy development, based on the evidence you have collated.

Protected Characteristic	Specific Characteristics	Positive Impact (it could benefit an equality group)	Negative Impact – (it could disadvantage an equality group)	Socio Economic / Human Rights Impacts
SEX/ GENDER	Women			
	Men			
	Transgender			
RACE*	White			
<i>Further information on the breakdown below each of these headings, as per census, is available here. For example Asian includes Chinese, Pakistani and Indian etc</i>	Mixed or Multiple Ethnic Groups			
	Asian			
	African			
	Caribbean or Black			
	Other Ethnic Group			
DISABILITY	Physical disability			
<i>A definition of disability under the Equality Act 2010 is available here.</i>	Sensory Impairment (sight, hearing,)			
	Mental Health			
	Learning Disability			

EQIA Screening Form

LGBT	Lesbians			
	Gay Men			
	Bisexual			
AGE				
	Older People (60 +)			
	Younger People (16-25)			
	Children (0-16)			
MARRIAGE & CIVIL PARTNERSHIP				
	Women			
	Men			
	Lesbians			
	Gay Men			
PREGNANCY & MATERNITY				
	Women			
RELIGION & BELIEF**				
A list of religions used in the census is available here .	See note			

* For reasons of brevity race is not an exhaustive list, and therefore please feel free to augment the list above where appropriate; to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions used in the census is available [here](#).

Summary of Protected Characteristics Most Impacted

Summary of Socio Economic Impacts

Summary of Human Rights Impacts

4. OUTCOMES, ACTION & PUBLIC REPORTING

Screening Outcome	Yes /No Or / Not At This Stage
Was a significant level of negative impact arising from the project, policy or strategy identified?	
Does the project, policy or strategy require to be amended to have a positive impact?	
Does a Full Impact Assessment need to be undertaken?	

Actions: Next Steps

(i.e. is there a strategic group that can monitor any future actions)

Further Action Required/ Action To Be Undertaken	Lead Officer and/or Lead Strategic Group	Timescale for Resolution of Negative Impact (s) / Delivery of Positive Impact (s)

Public Reporting

All completed EQIA Screenings are required to be publically available on the [Council EQIA Webpage](#) once they have been signed off by the relevant manager, and/or Strategic, Policy, or Operational Group. (See [EQIA Guidance](#): Pgs. 11-12). If there are any further queries please contact your named Equalities Officer or email Equality@glasgow.gov.uk

5. MONITORING OUTCOMES, EVALUATION & REVIEW

The Equalities Impact Assessment (EQIA) screening is not an end in itself but the start of a continuous monitoring and review process. The relevant Strategic, Policy, or Operational Group responsible for the delivery of the Policy, Project, Service Reform or Budget Option, is also responsible for monitoring and reviewing the EQIA Screening and any actions that may have been take to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from **Corporate Strategic Policy and Planning** will be available to provide support and guidance.

Legislation

Equality Act (2010) - the Equality Act 2010 (Specific Duties) Scotland Regulations 2012

The 2010 Act consolidated previous equalities legislation to protect people from discrimination on grounds of:

- race
- sex
- being a transsexual person (transsexuality is where someone has changed, is changing or has proposed changing their sex – called 'gender reassignment' in law)
- sexual orientation (whether being lesbian, gay, bisexual or heterosexual)
- disability (or because of something connected with their disability)
- religion or belief
- having just had a baby or being pregnant
- being married or in a civil partnership, and
- age.

Further information: [Equality Act Guidance](#)

As noted the Equality Act 2010 simplifies the current laws and puts them all together in one piece of legislation. In addition the **Specific Duties (Scotland Regulations 2012)** require local authorities to do the following to enable better performance of the general equality duty:

- report progress on mainstreaming the general equality duty
- publish equality outcomes and report progress in meeting those
- impact assess new or revised policies and practices as well as making arrangements to review existing policies and practices gather, use and publish employee information
- publish gender pay gap information and an equal pay statement
- consider adding equality award criteria and contract conditions in public procurement exercises.

Further information: [Understanding Scottish Specific Public Sector Equality Duties](#)

Fairer Scotland Duty

Authorities should also consider Socio-Economic Impacts where appropriate. Further information: [Fairer Scotland Duty Interim Guidance](#)

Enforcement

Judicial review of an authority can be taken by any person, including the Equality and Human Rights Commission (EHRC) or a group of people, with an interest, in respect of alleged failure to comply with the general equality duty. Only the EHRC can enforce the specific duties. A failure to comply with the specific duties may however be used as evidence of a failure to comply with the general duty.



Equality Impact Assessment (EQIA)

March 2019

Tomorrow's
Council

9 Protected Characteristics

When we talk about Protected Characteristics we refer to:

1. age,
2. disability,
3. sex,
4. gender reassignment,
5. sexual orientation,
6. race,
7. religion or belief (including lack of belief),
8. marriage and civil partnership,
9. pregnancy and maternity

Consideration should also be given to: **Socio economic circumstances/
Poverty and Income**

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The Equality Act 2010: Public Sector Duty

The duty on public authorities that is set out by the Equality Act 2010 is known as the General Duty and requires public authorities to pay due regard to all three of the following needs when carrying out their functions:

1. The need to eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct.
2. The need to advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
3. The need to foster good relations between people who share a protected characteristic and those who do not.

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The Equality Act 2010: Human Rights

We also need to consider, where applicable, to what (if any) extent policies, projects, Service Reforms, or Budget Options impact on three key strands of Human Rights, and whether these impacts are legal, necessary, proportionate, non discriminatory:

Absolute rights:

- the right to life,
- the right to freedom from inhuman and degrading treatment

Limited rights: (liberty, a fair trial)

Qualified rights: (respect for private and family life, home and correspondence, freedom of thought, conscience and religion, freedom of assembly and association and protection of property)

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When should I carry out an EQIA?

In order to fulfil our general duty it is critical that the all services conduct an **EQIA** in the following circumstances:

- **All** significant policies, strategies and projects should have as a minimum an EQIA screening inbuilt as part of the risk assessment process.
- **All** budget options for the each financial year will require to be EQIA screened. (It is possible to group individual options if they relate to one particular service area)
- **All** Reports to Committee now require Equalities Impacts to be reported either as an EQIA (screening or full report) or as a status report on Equalities considerations.
- Significant service reforms **may** require a Full Report to be completed, or as a minimum, a justification in a Screening Report as to why the Full Report was unnecessary.

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Two key types of EQIA

1. Equality Impact Assessment Screening

A screening can be undertaken as part of a scoping exercise prior to a full report, or it can stand alone as final summary if no significant Equalities Impacts are identified or arise subsequently in the policy or plan implementation

2. Equality Impact Assessment Full Report

A full report should be conducted for a significant service reform, or where a Screening indicates an area or areas that require more detailed consideration

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HR Equality Impact Assessment & HIA

Where further Impact Assessment is required:

Human Resources

Corporate HR have also developed a complimentary Equality Impact Assessment with particular reference to Employment legislation

- If the policy, strategy or budget option relates directly to staff, then the HR EQIA should be undertaken

Or

- If as part of standard EQIA a staff issue is prominent in the conclusions/ outcomes and requires further consideration

Health Impact Assessment (HIA)

This may also be required where particular and specific potential health impacts have been identified

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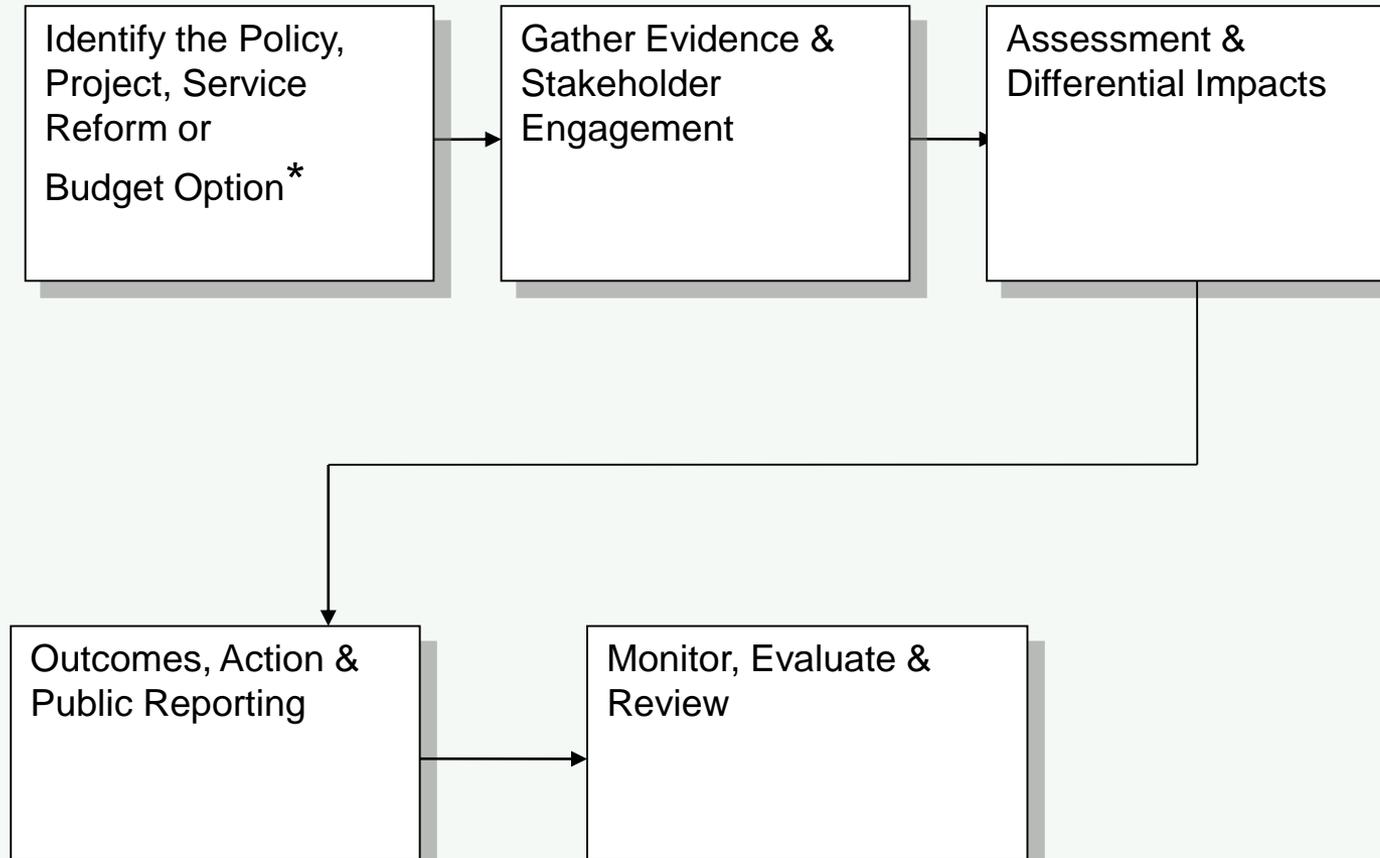
Initiating an EQIA

When you know the title and purpose of the EQIA – contact Corporate Services to log and initiate the process. This allows us to:

- Track the progress of EQIAs in the Council/ ALEOs
- Provide support where required
- Ensure there is clear council wide reporting of EQIAs

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Full Impact Assessment: 5 steps



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*
Refer to any previous EQIA Screening when Full EQIA being undertaken

Gathering Evidence: Supports and Tools

You are here: [Know Your Council](#) • [Policy, Planning and Strategy](#) • [Equalities Impact Assessment Evidence Matrix](#)

Equalities Impact Assessment Evidence Matrix

 [Equality Impact Assessment Guidance \[328kb\]](#) 

 [Equality Screening Form \[108kb\]](#) 

	Age	Disability	Ethnicity	Gender	Religion	Sexual Orientation	Pregnancy and Maternity	Marriage Civil Partnership
General Info								
Access to Services								
Poverty/Low Income								
Health								
Education								
Employment								
Discrimination								
Hate Crime/Safety								
Social Exclusion/Civic Engagement								
Economic Activity								

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EQIA: Outcomes

Outcomes

When the evidence has been considered in relation to the proposed Policy, Project, Service Reform or Budget Option, it will be apparent what the likely impacts are. The type, scale, duration, and specificity of the likely impacts will inform the direction of the outcome of the EQIA.

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EQIA: Outcomes

There are **four** potential outcomes as follows:

No major change required

The Policy, Project, Service Reform or Budget Option is robust and can continue unamended

Continue the Policy, Project, Service Reform or Budget Option

A justification is required for continuing despite the potential for adverse impact

Adjust or Amend the Policy, Project, Service Reform or Budget Option

Remove barriers, make changes to better advance equality or remove or mitigate negative impact

Stop, or Remove the Policy, Project, Service Reform or Budget Option

If adverse effects cannot be justified and cannot be mitigated.

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Reviewing and Updating

To ensure that EQIA is not separate from overall Risk Assessment it is important to:

- Link review and EQIA monitoring into existing strategic processes (recommend 6 months to 1 year for minimum review period)
- Any new evidence developed as part of an EQIA process, can be used as part of the Evidence Matrix refresh

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EQIA Screening Form (extract)

Protected Characteristic	Specific Characteristics	Positive Impact (it could benefit an equality group)	Negative Impact – (it could disadvantage an equality group)	Socio Economic / Human Rights Impacts
SEX/ GENDER	Women			
	Men			
	Transgender			
RACE* <i>Further information on the breakdown below each of these headings, as per census, is available here. For example Asian includes Chinese, Pakistani and Indian etc</i>	White			
	Mixed or Multiple Ethnic Groups			
	Asian			
	African			
	Caribbean or Black			
	Other Ethnic Group			
DISABILITY <i>A definition of disability under the Equality Act 2010 is available here.</i>	Physical disability			
	Sensory Impairment (sight, hearing,)			
	Mental Health			
	Learning Disability			

EQIA Screening Form (extract)

Screening Outcome	Yes /No Or / Not At This Stage
Was a significant level of negative impact arising from the project, policy or strategy identified?	
Does the project, policy or strategy require to be amended to have a positive impact?	
Does a Full Impact Assessment need to be undertaken?	

EQIA Screening Form (extract)

Actions: Next Steps

(i.e. is there a strategic group that can monitor any future actions)

Further Action Required/ Action To Be Undertaken	Lead Officer and/or Lead Strategic Group	Timescale for Resolution of Negative Impact (s) / Delivery of Positive Impact (s)

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Any Questions?

Practical Example:

What do we need to consider when completing this EQIA?

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Appendix 7

Summary of Engagement with Young Advisors Group for the Safer Stronger Communities Select Committee in-depth review into “How the Council embeds Equalities across its service delivery” – 9th December 2019

The Scrutiny Manager attended the Young Advisors meeting on the 9th December 2019 and gave an introduction to the Committee’s review. This was followed by an engagement session to get the views of those present facilitated by Jacob Sakil, Young Mayor Advisor Team.

Introduction given to the group:

A number of Councillors at Lewisham Council are carrying out an in-depth review into “How the Council embeds Equalities across its service provision”.

By Equalities we basically mean Fairness and making sure the Council’s own policies, the way it buys services, and the way it does the things that it needs to do, are fair to different people.

In particular when talking about Equalities, we refer to 9 characteristics that are protected in law by the Equalities Act 2010.

These are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

In addition to these considerations there is another area that Councillors are more and more interested in which is “socio-economic disadvantage”. This sounds like a confusing term and lots of people misuse it. In fact it is usually defined as a range of things that can put you at an economic disadvantage regardless of any of the 9 factors listed above. It is similar to “poverty” but not the same. By Socio-economic disadvantage we mean things such as having: low or no wealth; low income; whether you live in a deprived area; if you are unable to afford basic needs such as food or heating; and what your socio-economic background is. I understand that many of you considered similar issues in your manifestoes and looked at why some groups might be effected by poverty in different ways. Some people talk about “period poverty” “food poverty” “fuel poverty” etc. The problem is still the same – poverty – but it might be experienced more acutely in different ways by different groups.

As I am sure you can image from thinking about yourself, your family and friends, many of us have lots of different parts to us so all these factors can’t be considered in isolation.

The Committee are keen to hear from you as young people in the borough on what you think are the important issues and we have some questions that we would like you to discuss.

Questions (through a workshop facilitated by Jacob Sakil):

Do you feel that people making decisions in the Council understand about your needs? What do they not understand? What do they get right?

“They understand but don’t care about changing.”

Appendix 7

“There is always an adult’s point of view”

“surveys are often not effective – just seems like consultation but not real”

“some views and needs seem to be less valid than others due to people’s biases and perceptions”

“Older people seemed biased. They think about their own childhood experiences rather than listening to the reality from young people today – it’s not the same now.”

“People in the Council seem to be older - they don’t seem to care about young people or young black people.”

“Austerity – the Council has not invested in Youth Services – people from poorer backgrounds and ethnic minorities are most affected by this.”

Have you personally or someone you are with ever been unable to access a service because of something you feel is unfair? ie. Closure of a community centre/ changes to parks

- *Do you have examples of things that help you be able to use services (ie. What helps you be able to use a leisure centre/park/youth provision) (This could be for example that there is a reduced rate for kids/a place feels safe/ there is access for wheel chairs/it is near a bus route/ taking part in the Young Mayors programme*
- *Do you have examples of where there are barriers for you or friends (ie. No equipment for your age group/all the facilities in the leisure centre not suiting you (maybe time of day of classes or for older people; the park not feeling safe; no access for wheelchairs etc.*

“Homelessness – a friend was refused help by SHIP as she didn’t meet the criteria of being pregnant”

“Access to counselling services – a friend couldn’t access and was told by a teacher that there was no support unless they were suicidal”

“A post-16 careers day at school – there was no facilities such as a hearing loop and a pupil with a hearing impairment was told they wouldn’t be able to attend”

“Youth clubs – limited access has a big impact on often marginalised young people.”

“An HIV positive friend felt nervous about accessing services and enrolling at university”

“Lewisham Shopping Centre - only 2 young people are able to enter shops at once and young people are not allowed to congregate. It is one of the main things to do in Lewisham centre and young people are not able to.”

“Downham Library – we were kicked out as a group of young people for being too noisy”

“Libraries not being quiet enough to do homework anymore. This is a barrier for people who particularly need them.”

Appendix 7

“lots of places not being Autism friendly meaning they are hard to use or access for some people.”

“brother told to leave the school as the school was unable to adapt to his needs as an Autistic child.”

- *What helped you to decide to be involved with the Young Advisors project?*

“Working together, meeting others, and having an opportunity to make a change.”

“a place to hear different opinions.”

“found the information online.”

“an opportunity to voice opinions in a safe space.”

“useful events such as hearing about the cadets.”

- *Do you know what barriers there are for other people who may have liked to but didn't?*

“it starts and end quite late for some people.”

“it should be showcased more. Don't hear enough about it”.

“people might not know about it.”

- *Is there anything else that you would like to highlight in terms of the Council that you feel would be of interest to the Committee's review?*

Safer Stronger Communities Select Committee - Equalities review - Initial Response from METRO

1. Background

The Chair and Vice Chair of the Safer Stronger Select Committee have asked METRO Charity to comment on a number of areas to support the committee with their review on Equalities Provision. This is our response to the questions posed.

2. METRO's Equalities Role In Lewisham

METRO has been engaged to undertake a range of work around equalities from August 1 2019 up to end March 22:-

- Attendance at relevant equalities events and forums.
- Hosting Lewisham Equalities Forum meetings.
- Developing an equalities audit tool for the council and undertaking an independent audit.
- Providing case work support around LGBT hate crime.
- Improved understanding and awareness of LGBT hate crime matters via events, training and workshops.

3. Any knowledge METRO has would help the Committee understand if there are gaps/barriers

Currently our main experience is around the LGBTQ experience in Lewisham particularly around hate crime and safety. The council does fund specific provision e.g. youth clubs, hate crime work and mental health which should be applauded and is more diverse than many other councils. The main issue for LGBTQ people is that mainstream services either stigmatise, discriminate or do not consider the specific needs of LGBTQ people. Currently there is only one day a week of METRO's time to work around equality for LGBTQ people.

Our initial view is that as with other councils, data sources can be poor or lacking.

Again as with other councils, equalities monitoring is not as at its best as individuals are suspicious of disclosing their identity (as they fear it may lead to discrimination meaning that are stopped from accessing services)

We also know that in the borough the voluntary and community sector is very vibrant and passionate. The sector often speaks for and provides services that the council has never, or now is unable, to provide for people with protected characteristics

We are also concerned that there is now no disabled people's organisation in the borough that can provide a voice for this protected characteristic. It will take some time for any new organisation to develop to provide this input.

4. Are residents' equalities needs known and understood

Our initial view is that:-

- There is some understanding of some experience e.g. men's access to mental health and some BAME experiences and needs.
- Understanding needs is complicated and yet as with many other organisations, council processes can be fairly blunt instruments e.g. the African community is incredibly diverse yet monitoring normally just asks if someone is Black African
- The council needs to spend time engaging with the specialist knowledge within voluntary organisations to help to understand need.

5. METRO's engagement in the review of the Council's CES

METRO has recently had a positive meeting with officers leading the Council's review of the CES. Our main concerns are

- The previous process means that people in the community are reluctant to participate with this new review.
- That the timing is tight which may mean it is difficult to effectively engage with the community and the local voluntary sector to ensure the new CES is owned by all.

6. Examples of, Equalities good practice by local authorities that you could share?

We asked our national and regional networks for some initial ideas. The following areas have been cited: so far-

- Sutton – in the development of their fairness commission
- Redbridge- have focussed on unconscious bias training. Alongside a focus on accessibility including Makaton training.

7. How does METRO embed Equalities

METRO is an equality and diversity charity committed to promoting equality, combating discrimination and respecting the dignity and independence of our staff, volunteers and services users. We believe that everyone is entitled to be treated with respect, and to be protected from discrimination and harassment. We take care to undertake our work with due regard to individual needs and understand the requirements of the Equality Act 2010. We recognise that discrimination can and does occur on grounds of ethnicity, gender, sexual orientation, disability, immigration status, religion, poverty, age, class, as well as other differences in experience, belief, legal status and culture. Discrimination can be direct, indirect, or institutional. Equal treatment is often insufficient to secure equality of opportunity in employment or service provision and positive action can be required to achieve equality of opportunity.

Our policies and practice cover reasonable adjustments, governance, policy and staff recruitment

Some of our services are targeted at particular communities in need. We target specific very high risk or vulnerable communities e.g. Latino men who have sex with men, our mental health drop in for the LGBTQ community, our over 50s LGBT group, our prostate cancer group, our trans youth group

Alongside this we promote research and engage front line staff to develop our strategy and policies. We also view ongoing professional development around equalities issues as important for our staff e.g. training around sexuality and gender orientation, disability awareness and traveller awareness

As with any organisation striving to improve around equalities we know that we still need to improve particularly around physical access, engagement with BAME communities, support to trans communities, work with the lesbian community and support so that all staff in METRO whatever their characteristics can thrive and develop.

8. Best practice around EAA

At this point in time we don't have any views in this area

Naomi Goldberg

Director of Strategy

METRO

September 30 2019