



# **Equality impact of 2022/23 budget proposals: Final Equality Impact Assessments**

January 2022

## Equality Impact Assessment for increase in Council Tax, 2022/23

### 1. Introduction

1.1 **Service:** Revenues, Benefits & Fraud

1.2 **Name of proposal, policy, strategy or project:** To increase the Reigate & Banstead element of Council Tax by £5 per week from 01/04/2022

1.3 **This is:** A change to a policy or strategy

1.4 **Completing officer's name:** Simon Rosser

1.5 **Date (completion of draft):** 17/11/2021

1.6 **Date (completion of final):** 19/01/2022

### 2. About the proposal

*Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.*

#### 2.1 What is the main purpose of the proposal?

To increase the Reigate & Banstead element of Council Tax by the referendum limit of £5 per Band D property.

#### 2.2 Why is it being introduced, reviewed or changed now?

*This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.*

The Council Tax is reviewed annually as part of the Service & Financial Planning exercise. The increase for the financial year 2022/23 is being implemented due to the financial challenges being faced by the Council due to the withdrawal of government revenue support grant and the impact of the Covid 19 pandemic on Council income streams. Further explanation of the funding pressures faced by the Council is included in the draft budget report provided to the Executive in November 2021, available at <https://reigate-banstead.moderngov.co.uk/ie/ListDocuments.aspx?CId=137&MId=1810&Ver=4>

#### 2.3 Who is the intended audience or target group(s) for the proposal?

**Internal audience or group:** No internal audience or group

**External audience or group:** All residents

All residents who are liable to pay Council Tax to Reigate & Banstead

### 3. Who could be affected by your proposal?

*Information about the protected characteristic groups as defined by the Equality Act is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>. You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.*

*In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.*

#### 3.1 Will the proposal introduce a change which will significantly affect how services or functions are delivered?

No

Council Tax is charged to all liable persons who live in properties within the boundaries of Reigate & Banstead, this will continue to be the case.

#### 3.2 Will the proposal affect people (for example, service users, employees or the wider community)?

Yes

The proposal will impact those residents who are required to pay Council Tax.

### 4. Data and evidence

*In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:*

- *Relevant information about service users held by your service*
- *Relevant information about staff (eg, the workforce equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, staff surveys etc)*
- *Relevant information about borough residents (eg the borough equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, service user surveys etc)*
- *Relevant information published by third party organisations (eg data, research studies etc)*
- *Feedback or information from organisations representing target equality groups*

#### 4.1 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal, including sources, titles and dates where possible

This proposal affects all persons who are liable to pay Council Tax in respect of their home (residential address), including those properties which are currently empty. The list of liable parties is maintained in the Council Tax system.

The Borough Equality Profile on the Council website provides information about the protected characteristics of all residents within the borough.

**4.2 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?**

No

*If you have answered 'yes', please explain what the gaps are and suggest how those gaps could be filled in the future*

Not applicable

## **5. Assessment of potential impact of the proposal**

**5.1 Does your proposal relate to a service or function which evidence or information indicates is important to those with protected characteristics?**

No

*If you have answered 'yes', please outline the issues -these could include (for example) access to information or the ability to use or access a particular service)*

Not applicable

**5.2 Will the proposal intentionally target any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Not applicable

**5.3 Will the proposal intentionally exclude any particular protected characteristic group?**

Yes

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Children and persons under the age of 18 are not legally liable for Council Tax and therefore not affected by this proposal

**5.4 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?**

Yes, the proposal can be accessed equally

*If you have identified that there may be barriers, please identify these. Barriers may be physical, digital, social or cultural.*

Not applicable

**5.5 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?**

No potential positive equality benefits have been identified

The Council Tax increase will affect all residents who have a liability for Council Tax. For those residents on low income, the Local Council Tax Support scheme is in place to provide support in the form of reductions in the liable amount, and further reductions can also be applied under discretionary powers contained in Section 13(1)(C) of the Local Government Finance Act 1992

**5.6 Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both)**

*This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information. More information about the protected characteristic groups is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>*

**a) Age, including children, young people or older people**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. Although persons under the age of 18 cannot be made liable for Council Tax, inability to pay or financial hardship may have an indirect impact on children or young people.

However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**b) Disability, including physical, sensory or learning disability or long-term health impairment**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**c) Gender reassignment**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**d) Marriage and civil partnership**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**e) Pregnancy and maternity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**f) Race or ethnicity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**g) Religion or belief**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**h) Sex**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**i) Sexual orientation**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**j) Deprivation**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However, mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

**k) Other vulnerable group**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The impact will be on all residents who are liable to pay Council Tax and therefore there is possible impact if the individual is unable to pay the increased amount or there is financial hardship. However mechanisms are already in place to provide support for those on low incomes or in financial hardship by way of the Local Council Tax Support scheme and discretionary Section 13(a) reductions.

## **6. Consultation and mitigating action**

### **6.1 Has there been any consultation with relevant interested parties or is any consultation planned?**

Consultation has been undertaken

***Please explain the nature of any consultation that has been undertaken or is planned. How were protected characteristic groups consulted or how will they be consulted?***

Consultation on reduction of budget for the Borough News was undertaken as part of the 2022/23 budget setting process. This included an online questionnaire, plus the option for comments to be submitted via letter (Freepost) or email. The consultation ran for 8 weeks and was publicised via press release, web and social media, emails to a range of stakeholder organisations and via the Council's business e-newsletter.

***Please summarise the outcomes of any consultation. You may also include this in the 'Data & Evidence' section above***

51 consultation responses to the 'Council Tax' element of the budget proposals were received.

There was a broadly even split between participants who accepted or supported the proposal and those who were against it - around 1/3 supported it, 1/3 objected and 1/3 commented without their view being clear.

Participants cited pressures on household expenses, lower wages and a mismatch between the cost of Council Tax and the value of services received as reasons to oppose the increase, with some suggesting Council Tax should be reduced. Of those who supported or accepted this proposal, some mentioned that they wished to avoid the cost of a referendum to the public or that they felt an increase in Council Tax was inevitable.

***If no consultation has been undertaken and none is planned, please explain why consultation is not considered necessary?***

Not applicable



**6.2 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?**

*This could include changing or amending the proposed approach*

The approach to Council Tax applies to all residents equally. The Local Council Tax Support scheme is in place to support all residents who are on a low income and experiencing financial hardship. Residents that already receive support through this scheme will see their support increased in line with the increase

**6.3 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?**

*This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances*

The approach to increase Council Tax will apply to all residents equally. The Local Council Tax Support scheme exists to assist those on low incomes or in financial hardship, including those within protected characteristic groups or with other vulnerabilities. Residents that already receive support through this scheme will see their support increased in line with the increase

## **7. Monitoring and review**

**7.1 How do you propose to monitor and review the impact of your proposal?**

*Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)*

The Local Council Tax Support scheme is in place to support all residents who are on a low income and experiencing financial hardship. Residents that already receive support through this scheme will see their support increased in line with the increase. Additionally, reductions of Council Tax liability can also be made at the discretion of the Council under relevant legislation. The Council will monitor numbers of residents in receipt of Council Tax support to ensure their continued effectiveness.

## **8. Conclusions**

This section should be completed in support of the final proposal that is being presented to decision-makers

**8.1 Taking into account any mitigating actions, are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?**

*For example, physical, cultural or information access issues that cannot be resolved.*

No

***Please explain your answer. If negative impacts will remain please briefly explain these:***

No remaining negative impacts are expected. Residents on low incomes or in financial hardship will continue to be supported by the Local Council Tax Support scheme that is already in place.

## **8.2 Is any remaining negative impact legal or intended?**

***The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/justifying-discrimination>). However, this should always be a last resort***

Not applicable, no remaining negative impact

## **8.3 Any remaining negative unintended impacts must be drawn to the attention of the decision maker (for example, the relevant Board or Committee)**

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.

## Equality Impact Assessment for proposal to introduce Council Tax and Business Rates e-billing and associated budget savings

### 1. Introduction

- 1.1 **Service:** Revenues, Benefits & Fraud
- 1.2 **Name of proposal, policy, strategy or project:** Introduction of e-billing for Council Tax and Business Rates
- 1.3 **This is:** A new policy or strategy
- 1.4 **Completing officer's name:** Simon Rosser
- 1.5 **Date (completion of draft):** 17/11/2021
- 1.6 **Date (completion of final):** 19/01/2022

### 2. About the proposal

Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

#### 2.1 What is the main purpose of the proposal?

The proposal is to introduce e-billing for Council Tax and Business Rates (Non-Domestic Rates), for bills and associated notices. The project is intended to start in 2022.

#### 2.2 Why is it being introduced, reviewed or changed now?

*This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.*

The change is to provide residents with an alternative way of receiving their bills, reduce expenditure on paper notices and mailing costs and to reduce the Council's carbon footprint. The change is being introduced now as the technology is currently available, and to maximise the above benefits at the earliest opportunity.

#### 2.3 Who is the intended audience or target group(s) for the proposal?

**Internal audience or group:** No internal audience or group

**External audience or group:** Multiple (please specify below)

All residents who are liable to pay Council Tax to Reigate & Banstead

All businesses who are liable to pay Business Rates within Reigate & Banstead

### 3. Who could be affected by your proposal?

*Information about the protected characteristic groups as defined by the Equality Act is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>. You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.*

*In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.*

#### 3.1 Will the proposal introduce a change which will significantly affect how services or functions are delivered?

No

The change will not significantly affect how services or functions are delivered, rather provides a choice for billpayers

#### 3.2 Will the proposal affect people (for example, service users, employees or the wider community)?

Yes

The proposal will provide a choice for bill payers as to how they receive their bills.

### 4. Data and evidence

*In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:*

- *Relevant information about service users held by your service*
- *Relevant information about staff (eg, the workforce equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, staff surveys etc)*
- *Relevant information about borough residents (eg the borough equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, service user surveys etc)*
- *Relevant information published by third party organisations (eg data, research studies etc)*
- *Feedback or information from organisations representing target equality groups*

#### 4.1 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal, including sources, titles and dates where possible

The Council holds information about the residents and persons who are liable to pay Council Tax, and the businesses that are registered and liable to pay Business Rates.

**4.2 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?**

No

*If you have answered 'yes', please explain what the gaps are and suggest how those gaps could be filled in the future*

Not applicable

## **5. Assessment of potential impact of the proposal**

**5.1 Does your proposal relate to a service or function which evidence or information indicates is important to those with protected characteristics?**

Yes

*If you have answered 'yes', please outline the issues -these could include (for example) access to information or the ability to use or access a particular service)*

Some residents or business owners may prefer to receive their bills in paper form due to their protected characteristics or other vulnerabilities. In these instances, they will be able to opt out of e-billing and continue to receive their bills by post.

**5.2 Will the proposal intentionally target any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Not applicable

**5.3 Will the proposal intentionally exclude any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Not applicable

**5.4 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?**

No, there may be barriers to access

*If you have identified that there may be barriers, please identify these. Barriers may be physical, digital, social or cultural.*

Some residents or business owners may prefer to receive their bills in paper form due to their protected characteristics or other vulnerabilities. In these instances, they will be able to opt out of e-billing and continue to receive their bills by post.

**5.5 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?**

Yes, the proposal has potential positive equality benefits

Receiving bills by email rather than post may be preferable to some residents and businesses owners who have protected characteristics or other vulnerabilities.

**5.6 Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both)**

*This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information. More information about the protected characteristic groups is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>*

**a) Age, including children, young people or older people**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The changes will not affect children or those under the age of 18 as they will not be liable for council tax or business rates.

Older people may prefer to receive their bills electronically via email but for those who are not digitally enabled there will be the option to continue to receive bills by post.

**b) Disability, including physical, sensory or learning disability or long-term health impairment**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents with certain disabilities or impairments may prefer to receive bills electronically. Other residents may have disabilities or impairments that result in them being less digitally enabled – for all residents the option will remain to receive bills by post.

**c) Gender reassignment**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**d) Marriage and civil partnership**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**e) Pregnancy and maternity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**f) Race or ethnicity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**g) Religion or belief**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post.

**h) Sex**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**i) Sexual orientation**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents and business owners may prefer to receive their bills electronically via email but there will be the option to continue to receive bills by post

**j) Deprivation**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Those facing deprivation may be less digitally enabled – for all residents and businesses there will be the option to continue to receive bills by post

**k) Other vulnerable group**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Vulnerable people may be less digitally enabled due to their particular vulnerability – for all residents and businesses there will be the option to continue to receive bills by post

## **6. Consultation and mitigating action**

### **6.1 Has there been any consultation with relevant interested parties or is any consultation planned?**

Consultation has been undertaken

***Please explain the nature of any consultation that has been undertaken or is planned. How were protected characteristic groups consulted or how will they be consulted?***

Consultation on reduction of budget for the Borough News was undertaken as part of the 2022/23 budget setting process. This included an online questionnaire, plus the option for comments to be submitted via letter (Freepost) or email. The consultation ran for 8 weeks and was publicised via press release, web and social media, emails to a range of stakeholder organisations and via the Council's business e-newsletter.

***Please summarise the outcomes of any consultation. You may also include this in the 'Data & Evidence' section above***



40 consultation responses to the 'Revenues, Benefits and Fraud' element of the budget proposals were received.

Generally, those participants expressing a view accepted this proposal, however there was some concern about a move to providing billing and information online only, and the impact that this could have on residents who are not online.

***If no consultation has been undertaken and none is planned, please explain why consultation is not considered necessary?***

Not applicable

**6.2 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?**

***This could include changing or amending the proposed approach***

There will be an option for all residents and business owners to continue to receive their bills by post rather than email

**6.3 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?**

***This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances***

All residents and business owners will be able to choose to continue to receive their bills by post.

## **7. Monitoring and review**

**7.1 How do you propose to monitor and review the impact of your proposal?**

***Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)***

Monitoring will take place on the numbers of residents and business owners who have opted out of e-billing. Any impact of the changes will be picked up and reviewed via feedback from residents and business owners.

## **8. Conclusions**

This section should be completed in support of the final proposal that is being presented to decision-makers

**8.1 Taking into account any mitigating actions, are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?**

***For example, physical, cultural or information access issues that cannot be resolved.***

No

***Please explain your answer. If negative impacts will remain please briefly explain these:***

No remaining negative impacts are expected. All residents and businesses who wish to continue to receive bills via post will be able to do so.

### **8.2 Is any remaining negative impact legal or intended?**

***The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/justifying-discrimination>). However, this should always be a last resort***

Not applicable, no remaining negative impact

### **8.3 Any remaining negative unintended impacts must be drawn to the attention of the decision maker (for example, the relevant Board or Committee)**

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.

## Equality Impact Assessment for reduction of Borough News budget

### 1. Introduction

**1.1 Service:** Communications, Customer Contact & Data and Insight

**1.2 Name of proposal, policy, strategy or project:** Reduction in budget for the publication of 'Borough News'

**1.3 This is:** A change to a project or activity

Reduction in the budget means that the Council will only be able to publish its Borough News magazine once per year rather than two times per year.

**1.4 Completing officer's name:** Carys Jones

**1.5 Date (completion of draft):** 19/11/2021

**1.6 Date (completion of final):** 19/01/2022

### 2. About the proposal

Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

#### 2.1 What is the main purpose of the proposal?

It is proposed to reduce the allocated budget for the design, print and distribution of the Council's 'Borough News' residents' magazine from April 2022 onwards to deliver cost savings. The practical implication of this means that the Council will only be able to publish its Borough News (BN) magazine once per year (compared to the usual two times per year).

#### 2.2 Why is it being introduced, reviewed or changed now?

*This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.*

The reduction of the budget is due to the financial challenges being faced by the Council – these are both as a result of the withdrawal of central government revenue support grant over recent years and due to the impact of the Covid-19 pandemic on sources of income that the Council uses to fund its service delivery. Further explanation of the funding pressures faced by the Council is included in the draft budget report provided to the Executive in November 2021, available at <https://reigate-banstead.moderngov.co.uk/ieListDocuments.aspx?CIId=137&MIId=1810&Ver=4>

By reducing the frequency of Borough News (BN), some financial savings can be achieved whilst retaining an annual printed publication for residents.

### **2.3 Who is the intended audience or target group(s) for the proposal?**

**Internal audience or group:** No internal audience or group

**External audience or group:** All residents

The Borough News is sent to all households in the borough. The reduction in the Borough News budget means that residents will only receive one Borough News magazine each year.

## **3. Who could be affected by your proposal?**

*Information about the protected characteristic groups as defined by the Equality Act is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>.*

*You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.*

*In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.*

### **3.1 Will the proposal introduce a change which will significantly affect how services or functions are delivered?**

No

Reduction in budget means that there will be a reduction in the frequency of the production and delivery of the Council's resident magazine, which is the Council's primary corporate channel for communicating with non-digital audiences in particular. However, it will continue to be produced and distributed, albeit once rather than twice a year.

### **3.2 Will the proposal affect people (for example, service users, employees or the wider community)?**

Yes

Some residents may rely on the Borough News as their main source of information about Council services, activities and support.

## **4. Data and evidence**

*In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:*

- *Relevant information about service users held by your service*
- *Relevant information about staff (eg, the workforce equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, staff surveys etc)*

- **Relevant information about borough residents (eg the borough equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, service user surveys etc)**
- **Relevant information published by third party organisations (eg data, research studies etc)**
- **Feedback or information from organisations representing target equality groups**

#### **4.1 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal, including sources, titles and dates where possible**

##### **Evidence source: Borough News Reader Survey (2019)**

Although not a fully representative survey, this reported that:

- 36% of residents read the BN thoroughly and 38% read parts in detail.
- The twice yearly publication was considered by 72% of residents to be 'about right' in terms of frequency
- 71% of people reported that they would like to be kept informed by the Borough News magazine through the door in the future. This compared to 32% who said email, 21% who said they would like an online magazine and 23% who said via the Council website.

The survey did not collect information about respondents' protected characteristics

##### **Evidence source: Residents' Survey Wave 2 (2021)**

In this representative Residents' Survey, residents were asked how they would like to be kept informed (and were able to pick multiple answers).

- 70% of all residents indicated they prefer emails or e-newsletters
- 52% of all residents indicated they refer the Borough News
- Residents aged 65+ were most likely (68%) to prefer the Borough News
- Residents with a long-term health problem or disability were more likely (64%) to prefer this method of being kept informed.

##### **Evidence source: Borough equality characteristics report (2020)**

This reports that information about digital exclusion from 2019 (ONS) suggests that 1.4% of the borough population has never used the internet, meanwhile figures from 2017 suggest that 8.2% of adults did not access online services over a 3 month period, and around 20% lack one or more basic digital skills. This suggests that a small number of residents may be reliant on 'hard copy' correspondence from the Council and would not be able to access digital content.

Older residents (those 65+) who are most likely to prefer the Borough News delivered through the door comprise 18.2% of the borough's population.

In the 2011 Census 8% of residents reported that long term illness or disability impacted their day to day activities 'a little', and 6% 'a lot'. This includes health problems related to old age.

##### **Evidence source: Digital inclusion in Surrey, report for SCC (2019)**

Research undertaken for Surrey County Council in 2019 suggested that 11% of adults across the County had not used the internet within the last three months (including those who had never used it)

**4.2 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?**

No

*If you have answered 'yes', please explain what the gaps are and suggest how those gaps could be filled in the future*

n/a

## **5. Assessment of potential impact of the proposal**

**5.1 Does your proposal relate to a service or function which evidence or information indicates is important to those with protected characteristics?**

Yes

*If you have answered 'yes', please outline the issues -these could include (for example) access to information or the ability to use or access a particular service)*

As identified above, a higher proportion of older residents and those with long term health problems or disabilities report that they would prefer a 'through the door' BN publication to other forms of communication from the Council. The reasons for this are not clear but may reflect less confidence with or access to other communication channels such as email or social media.

**5.2 Will the proposal intentionally target any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

N/A

**5.3 Will the proposal intentionally exclude any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

N/A

**5.4 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?**

No, there may be barriers to access

*If you have identified that there may be barriers, please identify these. Barriers may be physical, digital, social or cultural.*

The proposal will see a reduction in the frequency of council information being made available in print format – non-digitally enabled audiences have limited alternate means of accessing this information

**5.5 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?**

No potential positive equality benefits have been identified

The proposal will see a reduction of information for residents available in printed form. As such it will not reduce inequalities or improve outcomes

**5.6 Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both)**

*This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information. More information about the protected characteristic groups is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>*

**a) Age, including children, young people or older people**

**What is the nature of the impact?** Negative

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Potential negative impact. The proposal can be expected to impact most on our non-digital residents, for whom Borough News provides printed information on the Council and its services, and who will see a reduction in the frequency of this printed information. Although non-digital audiences are largely assumed to be older people, sometimes low income can be a barrier for those unable to afford broadband or mobile data connectivity. A reduction in the frequency of the BN may mean that residents who are less digitally enabled are less able to access information about council support services that may be available to them or have to access this information in a different way.

**b) Disability, including physical, sensory or learning disability or long-term health impairment**

**What is the nature of the impact?** Negative

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Potential negative impact. In the Residents' Survey, residents with a long term health problem or disability were more likely to prefer the BN as a method of being kept informed. This compares to about half of those without a long term health problem or disability. The BN is available in a range of accessible formats on request and there are no plans to change this. A reduction in the frequency of the BN may mean that less digitally enabled residents are less able to access information about council support services that may be available to them, or have to access this information in a different way. It should also be noted that on-line forms of communication may be preferred by some residents with disabilities or health impairments.

**c) Gender reassignment**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**d) Marriage and civil partnership**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**e) Pregnancy and maternity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**f) Race or ethnicity**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**g) Religion or belief**

**What is the nature of the impact?** Neutral



**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**h) Sex**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**i) Sexual orientation**

**What is the nature of the impact?** Neutral

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Click or tap here to enter text.

**j) Deprivation**

**What is the nature of the impact?** Negative

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Potential negative impact. The proposal can be expected to impact most on our non-digital residents, for whom Borough News provides printed information on the Council and its services, and who will see a reduction in the frequency of this printed information. Although non-digital audiences are largely assumed to be older people, sometimes low income can be a barrier for those unable to afford broadband or mobile data connectivity. A reduction in the frequency of the BN may mean that residents who are less digitally enabled due to the inability to afford technology or connectivity are less able to access information about council support services that may be available to them, or have to access this information in a different way

**k) Other vulnerable group**

**What is the nature of the impact?** Negative

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Potential negative impact. The proposal can be expected to impact most on our non-digital residents, for whom Borough News provides printed information on the Council and its services, and who will see a reduction in the frequency of this printed information. Although non-digital audiences are largely assumed to be older people, sometimes low income can be

a barrier for those unable to afford broadband or mobile data connectivity. A reduction in the frequency of the BN may mean that residents who are less digitally enabled due to their particular vulnerabilities are less able to access information about council support services that may be available to them, or have to access this information in a different way

## 6. Consultation and mitigating action

### 6.1 Has there been any consultation with relevant interested parties or is any consultation planned?

Consultation has been undertaken

***Please explain the nature of any consultation that has been undertaken or is planned. How were protected characteristic groups consulted or how will they be consulted?***

Consultation on reduction of budget for the Borough News was undertaken as part of the 2022/23 budget setting process. This included an online questionnaire, plus the option for comments to be submitted via letter (Freepost) or email. The consultation ran for 8 weeks and was publicised via press release, web and social media, and emails to a range of stakeholder organisations.

***Please summarise the outcomes of any consultation. You may also include this in the 'Data & Evidence' section above***

57 consultation responses to the 'Communications' element of the budget proposals were received.

The majority of respondents who commented on the proposal to reduce the BN budget supported it. However, several responses raised concerns about how digitally excluded audiences (whether themselves or others in the community) would receive information from the Council. Several participants incorrectly assumed the publication would be available digitally even if it was not printed.

***If no consultation has been undertaken and none is planned, please explain why consultation is not considered necessary?***

N/A

### 6.2 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?

***This could include changing or amending the proposed approach***

Other work is underway by the Council (see below and documents in the relevant service plan supporting the budget proposals) to understand residents contact and communications needs, which will help ensure that opportunities are taken to deliver accessible communications in a cost effective way.

### **6.3 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?**

***This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances***

The following options have been identified and will be pursued:

- 1) The Council's communications team will explore external funding opportunities which could be used to make additional printed communications materials available to residents (e.g. availability of government grants, sponsorship opportunities etc)
- 2) It is proposed to review, update and then implement the Council's communications strategy to ensure it supports the Council's corporate plan. This will include considering issues of accessibility and digital inclusion/exclusion.
- 3) It is proposed to develop a new customer contact strategy and approach for the Council, which will also consider the contact needs of residents with protected characteristics.
- 4) The Council will continue to work with partners across surrey to address the digital divide and develop and use tools such as <https://www.surreyi.gov.uk/understanding-digital-exclusion-in-surrey/>. This will ensure our future activity to support digitally excluded residents is appropriately targeted.

## **7. Monitoring and review**

### **7.1 How do you propose to monitor and review the impact of your proposal?**

***Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)***

As part of updating the Council's communications strategy, we will be reviewing the available data and resident insight to assess whether our communications channels remain fit for purpose and/or to identify any gaps or areas of improvement within available budget / resource. This will ensure that best value is secured. Recommendations with respect of communicating with digitally excluded customers (beyond just BN) will be forthcoming as part of that work.

The Customer Contact Team will be asked to keep a note of callers requesting printed communications materials, to identify any increasing trend that could be linked to the reduction in frequency of BN. This insight will be fed into the review of the Council's communications strategy and customer contact strategy (as above).

## **8. Conclusions**

This section should be completed in support of the final proposal that is being presented to decision-makers

**8.1 Taking into account any mitigating actions, are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?**

*For example, physical, cultural or information access issues that cannot be resolved.*

No

*Please explain your answer. If negative impacts will remain please briefly explain these:*

The identified measures at section 6.3 and 7.1 will ensure that the Council's communications and customer contact continue to consider the needs of those with protected characteristics, and those who are digitally disadvantaged either as a result of those characteristics or other vulnerabilities.

**8.2 Is any remaining negative impact legal or intended?**

*The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/justifying-discrimination>). However, this should always be a last resort*

Not applicable, no remaining negative impact

**8.3 Any remaining negative unintended impacts must be drawn to the attention of the decision maker (for example, the relevant Board or Committee)**

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.

## Equality Impact Assessment for pause in Community Partnerships Small and Medium Grants funding and reduction to partnerships projects budget

### 1. Introduction

**1.1 Service:** Community Partnerships

**1.2 Name of proposal, policy, strategy or project:**

Pause in Community Partnerships Small and Medium Grants Funding and reduction to partnerships projects budget (Note core funding for commissioned services is unaffected by this proposal)

**1.3 This is:** A change to a policy or strategy

**1.4 Completing officer's name:** Justine Chatfield

**1.5 Date (completion of draft):** 08/11/2021

**1.6 Date (completion of final):** 19/01/2022

### 2. About the proposal

Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

**2.1 What is the main purpose of the proposal?**

It is proposed to

- Temporarily withdraw funding for the Council's Small Grants scheme (value £45k). This scheme provides local voluntary and community organisations with access to grants of up to £2k when nominated by Councillors
- Temporarily withdraw funding for the Council's Medium Grants scheme (value £50k) which provides local voluntary and community organisations with grants of between £2k and £10k via a bidding process
- Reduce the partnerships projects budget by £5k – this budget primarily funds statutory community safety work but has also in the past been used to contributed to voluntary and community sector Surrey-wide initiatives. The proposal represents a 14% reduction in the partnerships projects budget and reflects budget underspend in recent years

Core funding for commissioned services is unaffected by this proposal.

## 2.2 Why is it being introduced, reviewed or changed now?

*This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.*

The pausing and reductions in budget described above are proposed due to the financial challenges being faced by the Council – these are both as a result of the withdrawal of central government revenue support grant over recent years and due to the impact of the Covid-19 pandemic on sources of income that the Council uses to fund its service delivery. Further explanation of the funding pressures faced by the Council is included in the draft budget report provided to the Executive in November 2021, available at <https://reigate-banstead.moderngov.co.uk/ieListDocuments.aspx?CIId=137&MIId=1810&Ver=4>

The Council is prioritising maintaining its financial support for its directly commissioned VCS partners in 2022/23. It is intended to reintroduce small and medium Grants budgets (or a successor version thereof) once the Council's financial position improves.

## 2.3 Who is the intended audience or target group(s) for the proposal?

**Internal audience or group:** No internal audience or group

**External audience or group:** Multiple (please specify below)

The proposal will directly impact those Voluntary, community and faith sector ('the VCS') who may have been intending to seek to access to Council funding via the small and medium grants bidding process.

The pausing of small and medium grants which would otherwise have been available for local VCS services to bid for may impact on the services these organisations provide, which may be used by residents, partner organisations and other council services.

## 3. Who could be affected by your proposal?

*Information about the protected characteristic groups as defined by the Equality Act is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>.*

*You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.*

*In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.*

### 3.1 Will the proposal introduce a change which will significantly affect how services or functions are delivered?

Yes

**Grants:** Yes. As a result of the budget proposals, the grants currently offered by the Council will be paused; with resumption of the service in future years when the Council's financial position improves enabling replacement funding to be secured. The provision of grants by the Council has been used to support and shape the local VCS offer to align with Council

priorities. It is possible that the Council's relationship with the local VCS may be impacted as a result of the Grants suspension.

**Partnership projects budget:** No, it is not anticipated that the proposed reduction will impact on how services and functions are delivered as it is reflective of budget underspend in recent years.

### 3.2 Will the proposal affect people (for example, service users, employees or the wider community)?

Yes

**Grants:** Potentially. The local voluntary sector may struggle to sustain services and functionality if they can't access funding from the Council or other sources. This means that the proposal may impact residents that benefit from the local VCS offer if services are reduced as a result of the VCS not being able to access alternative funding.

**Partnership projects budget:** No, it is not anticipated that the proposed reduction will affect people as it is reflective of budget underspend in recent years

## 4. Data and evidence

*In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:*

- *Relevant information about service users held by your service*
- *Relevant information about staff (eg, the workforce equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, staff surveys etc)*
- *Relevant information about borough residents (eg the borough equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, service user surveys etc)*
- *Relevant information published by third party organisations (eg data, research studies etc)*
- *Feedback or information from organisations representing target equality groups*

### 4.1 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal, including sources, titles and dates where possible

Evidence base: Council information about the Grants schemes

The Council has delivered its Small Grants scheme since 2019/20, and since then has provided £120k of funding to local VCS partners. The Council's Medium Grants scheme has provided £100k of funding to local VCS organisations over the same timeframe.

These grants have enabled a variety of activities to take place including 24 advice and support services, 20 projects to repair/upgrade community buildings; 8 activity groups or events, 5 food poverty projects and 5 projects supporting charity development. These activities will often have benefitted people experiencing deprivation, vulnerable people, older people, people with disabilities, pregnant women and those with young children. Analysis

suggests that 84% of medium grants and 64% of small grants from the Council have been directly used to support disadvantaged groups (the focus of the grants to date was also referenced in the consultation response from Voluntary Action Reigate & Banstead).

VCS organisations have indicated to the Council that securing external funding has become more of a challenge for them since the pandemic.

We understand that VCS organisations tend to have between 3 to 6 months of reserves.

#### **4.2 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?**

Yes

***If you have answered 'yes', please explain what the gaps are and suggest how those gaps could be filled in the future***

Yes. The following elements are outside the control of the Council and we therefore do not have evidence:

It is not possible for the Council to know which organisations may have been intending to apply for small or medium grants from the Council, and we do not know which organisations would have been successful in their applications.

While we have a good understanding of other funding streams that might be available to the VCS (that offer similar funding and alternatives to the Council's small and medium grants) it is also not possible for the Council to know the likelihood of success for any organisations in applying for alternative grants.

It is also not possible to know the extent to which organisations may have been relying on receiving funding from the Council via its small and medium grants scheme to deliver their activities; nor what decisions those organisations may take in terms of planning their future work if they do not secure replacement funding.

## **5. Assessment of potential impact of the proposal**

### **5.1 Does your proposal relate to a service or function which evidence or information indicates is important to those with protected characteristics?**

Yes

***If you have answered 'yes', please outline the issues -these could include (for example) access to information or the ability to use or access a particular service)***

Indirectly. The Council's Small and Medium grants provide funding for local projects (including in disadvantaged communities) and for local charities which have an established track record in supporting local people (including local people with protected characteristics)



**5.2 Will the proposal intentionally target any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Not applicable

**5.3 Will the proposal intentionally exclude any particular protected characteristic group?**

No

*If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is*

Not applicable

**5.4 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?**

See comment below

*If you have identified that there may be barriers, please identify these. Barriers may be physical, digital, social or cultural.*

The proposal does not introduce any barriers, however the pausing of making funding available via the small and medium grants scheme has the potential to impact different VCS organisations differently, therefore some communities that benefit from their services could potentially be more indirectly impacted than others - but as noted above the evidence does not exist to allow us to determine who and how.

**5.5 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?**

No potential positive equality benefits have been identified

While no potential positive equality benefits of this proposal have been identified, pausing the small and medium grants programme does provide the opportunity for the Council to review its approach to ensure that in the future grant money (and other support) is targeted in a way that delivers maximum value for money and benefits for local residents with protected characteristics or who are otherwise vulnerable.

**5.6 Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both)**

*This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information. More information about the protected*

*characteristic groups is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>*

**a) Age, including children, young people or older people**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants have in the past been awarded to VCS organisations/groups whose work supports a particular age cohort such as the elderly or young people.

Pausing these grants may, over time, have a negative impact on services provided by the VCS sector for residents within any one of the protected characteristic groups, or who are otherwise vulnerable, if it results in changes to how the VCS provides services for these residents. This may in turn have impacts on those residents in relation to their physical or mental health or place additional pressure on other public sector services.

However, it is not possible for the Council to know what specific organisations may be impacted by the proposed pause in grants as it is not possible to predict which organisations may have applied for the funding, and which would have been successful. It is also not possible to know which organisations may receive funding from alternative sources instead, and therefore what the impact on local VCS activities in the future will be. As decisions about the provision of activities lies outside the Council's control it is not possible to know (if activities are impacted due to a lack of funding), how they will be affected and whether residents in protected characteristic groups, or who are otherwise vulnerable, would be impacted.

Given that any future impact cannot be determined at this stage, monitoring measures will be put in place in parallel with the pause in grants (see section 7.1 below) to track any emerging impact, and this will inform future decisions as to the future targeting of financial and other support by the Council (see section 6.3).

**b) Disability, including physical, sensory or learning disability or long-term health impairment**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants have in the past been awarded to VCS organisations/groups whose work supports disabled residents.

It is not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a)

**c) Gender reassignment**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Although small and medium grants have not been provided to provide support to this protected group in the past, organisations providing support for gender reassigned or transitioning residents may have applied in the future.

It is therefore not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a)

**d) Marriage and civil partnership**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Although small and medium grants have not been provided to provide support to this protected group in the past, organisations providing support for residents covered by this protected characteristic may have applied in the future.

It is therefore not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a)

**e) Pregnancy and maternity**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants have previously been awarded to VCS organisations/groups whose work supports expectant / new parents. It is not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a).

**f) Race or ethnicity**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants have previously been awarded to VCS organisations/groups whose work supports minority ethnic communities.

It is not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a)

**g) Religion or belief**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Faith sector organisations have been eligible to apply for these grants when their proposal has clear wider community benefits. However, for the same reasons as set out under 5.6(a) it is not possible to determine any future impact on this protected group.

**h) Sex**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants have previously been awarded to VCS organisations/groups whose work supports women. For the same reasons as set out under 5.6(a) above it is not possible to determine any future impact on this protected group.

**i) Sexual orientation**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Although small and medium grants have not been provided to provide support to this protected group in the past, organisations providing support for residents of different sexual orientations may have applied in the future.

It is therefore not possible to determine any future impact on this protected group for the same reasons as set out under 5.6(a)

**j) Deprivation**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants are often awarded to VCS organisations/groups whose work supports activities in an area of deprivation. For example, community development workers have often supported local groups to apply to these funds for projects in these disadvantaged communities they are looking to support.

However, for the same reasons as identified at 5.6(a) above it is not possible to determine any future impact on residents living in deprived areas

**k) Other vulnerable group**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Small and medium grants are often awarded to VCS organisations/groups whose work supports vulnerable residents. However, for the same reasons as identified at 5.6(a) above it is not possible to determine any future impact on vulnerable residents.

## **6. Consultation and mitigating action**

### **6.1 Has there been any consultation with relevant interested parties or is any consultation planned?**

Consultation has been undertaken

***Please explain the nature of any consultation that has been undertaken or is planned. How were protected characteristic groups consulted or how will they be consulted?***

Consultation on removal of budget for the small and medium grants and partnerships projects funding was undertaken as part of the 2022/23 budget setting process. As well as general (borough-wide) consultation, all those organisations that have been awarded grant funding in recent years were contacted. The consultation ran for 8 weeks.

***Please summarise the outcomes of any consultation. You may also include this in the 'Data & Evidence' section above***

70 consultation responses to the 'Community Partnerships' element of the budget proposals were received. Specifically in relation to the proposal to pause small and medium grants, there was considerable concern expressed by respondents. 24 of all responses to the consultation were identified as being from a representative of a community or voluntary sector organisation.

Responses from VCS organisations set out their experiences reporting substantial challenges in finding alternative funding in the current climate and expressing concerns that reducing funding would be counterproductive and that it would have a disproportionate effect on the borough's most vulnerable residents. Council small and medium grants were reported to be valued by the VCS sector whereas some felt other forms of support from the Council (eg funding advice) are less valuable. Other respondents similarly were fearful that if such Council grants were no longer available it may result in community projects being impacted that people rely on.

***If no consultation has been undertaken and none is planned, please explain why consultation is not considered necessary?***

Not applicable

**6.2 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?**

*This could include changing or amending the proposed approach*

The pause in small and medium grant funding will be used as an opportunity to review the Council's approach to supporting VCS organisations to ensure that it delivers maximum value for money in terms of the Council's ability to support the VCS to deliver services that are needed by local people.

**6.3 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?**

*This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances*

The assessment at section 5 has concluded – due to various decisions being outside the control of the Council - it is not possible to determine what the indirect impact the proposal to pause small and medium grants may be on any protected characteristic group or other vulnerable resident.

The following actions have therefore been identified alongside the proposed pause in grant funding, alongside the monitoring activity set out in section 7.:

In the immediate term, to mitigate the impact of small and medium grant funding for this year being paused:

- (1) Seeking to strengthen and support routes to other funding sources by offering enhanced support / volunteer support with fundraising to VCS organisations and providing ongoing and up to date information on local funding opportunities
- (2) Developing a VCS strategy with partners in order to identify other forms of in-kind support or resource that could help sustain and develop their offer to vulnerable groups and those with protected characteristics.
- (3) Where appropriate, continuing to identify opportunities to provide RBBC staff expertise to assist local VCS partners on an ad hoc basis to assist their service delivery (e.g. HR advice, finance systems advise, etc.), and work towards formally launching the Council's employee volunteering policy in 2022

To inform work to determine when and how the Council will resume its small and medium grants activity, and inform the Council's service and financial planning process and any in-year resource allocation:

- (4) Reviewing resources across the Community Partnerships Team next financial year to see if any work could be undertaken to create a separate grant budget (taking into account the overall costs and benefits of different support activities)
- (5) Using the monitoring information gathered (see below), and continuing engagement with the sector, to understand if there are any protected characteristic groups where specific mitigating action and future financial or other support needs to be targeted.

## 7. Monitoring and review

### 7.1 How do you propose to monitor and review the impact of your proposal?

***Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)***

As identified above it is not possible for the Council to determine what the indirect impact the proposal to pause small and medium grants may be on any protected characteristic group or other vulnerable resident. Monitoring of the impact, and using the outcomes of this monitoring to inform regular review, is therefore vital

The Community Partnerships team will continue to engage with the VCS to understand the impact of the pause on the services that the VCS provides, and the associated potential impact on vulnerable residents or those with protected characteristics). This will be done via regular partnership meetings and using established council member and officer networks.

The outcomes of this work will regularly be reported to the relevant portfolio holder. The information collected will be used to inform and target the delivery of the actions identified in 6.3 above.

The information gathered will inform the service planning and budget setting process and decisions for 2023/24 (and potentially future years) as to the re-implementation of the paused grant funding, either in the original or an amended format reflecting the outcome of monitoring and mitigation work.

If any adverse impacts become apparent 'in year' via the regular reporting identified above, the need for additional mitigating action over and above that identified in section 6.3 will be considered

## 8. Conclusions

This section should be completed in support of the final proposal that is being presented to decision-makers

### 8.1 Taking into account any mitigating actions, are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?

***For example, physical, cultural or information access issues that cannot be resolved.***

No

***Please explain your answer. If negative impacts will remain please briefly explain these:***

No remaining negative impacts are expected. The Community Partnerships Team has positive relationships with the VCS which – as identified in 6.3 and 7 above means that the Council will be able to understand if there is going to be any negative impact on services for people with protected characteristics or other vulnerabilities and (if so) consider the most

appropriate means of mitigating these, be that through alternative means of support or ending the grants pause.

We recognise that there is a degree of uncertainty around the precise implications of the proposal and to ensure we remain compliant with our overriding duties a higher level of monitoring and oversight will be implemented in support of this proposal including regular engagement with local VCS organisations and regular review of the data.

## **8.2 Is any remaining negative impact legal or intended?**

The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/justifying-discrimination>). However, this should always be a last resort

Not applicable, no remaining negative impact

## **8.3 Any remaining negative unintended impacts must be drawn to the attention of the decision maker (for example, the relevant Board or Committee)**

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect
  - The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.



## Equality Impact Assessment for removal of budget to fund one Community Development Worker post

### 1. Introduction

**1.1 Service:** Community Partnerships

**1.2 Name of proposal, policy, strategy or project:** Removal of budget to fund one Community Development Worker Post

**1.3 This is:** A change to a project or activity

Deletion of budget that funds one of five Community Development Worker (CDW) posts.

**1.4 Completing officer's name:** Justine Chatfield

**1.5 Date:** 10/01/2022

### 2. About the proposal

Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

#### 2.1 What is the main purpose of the proposal?

It is proposed to withdraw the budget allocated to funding one of the Council's five Community Development Worker posts.

The immediate practical implication of this is that the Council will not look to recruit to the currently vacant Woodhatch and Whitebushes Community Development Worker post. It is also proposed to review the focus of Council's Community Development work to ensure that the remaining resources are targeted to best effect.

#### 2.2 Why is it being introduced, reviewed or changed now?

***This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.***

The deletion of the budget for the post described above is proposed due to the financial challenges being faced by the Council – these are both as a result of the withdrawal of central government revenue support grant over recent years and due to the impact of the Covid-19 pandemic on sources of income that the Council uses to fund its service delivery. Further explanation of the funding pressures faced by the Council is included in the draft budget report provided to the Executive in November 2021, available at <https://reigate-banstead.moderngov.co.uk/ieListDocuments.aspx?CIId=137&MIId=1810&Ver=4>

### 2.3 Who is the intended audience or target group(s) for the proposal?

**Internal audience or group:** Staff within one particular team (please specify below)

**External audience or group:** Multiple (please specify below)

Internal:

- Whilst not the intended audience for the proposal, CDWs work with Council teams / officers to help them engage with residents within the relevant area; so indirectly an impact may be experienced by these services.

External:

- Statutory, voluntary, community and faith sector partners. In the immediate term, the impact will be in Woodhatch and Whitebushes.
- Residents and organisations directly supported by CDW. In the immediate term, the impact will be in Woodhatch and Whitebushes.

## 3. Who could be affected by your proposal?

*Information about the protected characteristic groups as defined by the Equality Act is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>.*

*You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.*

*In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.*

### 3.1 Will the proposal introduce a change which will significantly affect how services or functions are delivered?

Yes

Withdrawal of budget, and associated deletion of the vacant post will impact on how community development services are delivered.

The currently vacant post to which this budget is allocated is for the Woodhatch and Whitebushes area, so without mitigation the immediate service impact will be felt in this area.

The nature of the medium to longer term impact will depend on future service decisions as to the focus of other resources in the team.

### 3.2 Will the proposal affect people (for example, service users, employees or the wider community)?

Yes

The Council's Community Development Workers support residents, including vulnerable residents, in the less advantaged communities in the borough, building relationships within those communities and working with residents and local stakeholders to identify and deliver opportunities for improvement.

In the immediate term, without mitigation, the proposal has the potential to impact people in the Woodhatch and Whitebushes area as the currently vacant post here will not be recruited to. Since this post was introduced in July 2019, residents have

been supported by the CDW to access services and get involved in project delivery in the area. Not having a CDW embedded in this community would also impact on connections and joint work across the area coordinated through the local partnership group.

To mitigate the impact of the current vacancy, colleagues are currently covering delivery of existing projects in the area.

A review of Council's Community Development work is also being undertaken to ensure that the remaining resources in the team continue to be targeted to best effect (reflecting areas of greatest need and seeking to advance equality of opportunity) in the future.

## 4. Data and evidence

*In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:*

- **Relevant information about service users held by your service**
  - **Relevant information about staff** (eg, the workforce equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, staff surveys etc)
  - **Relevant information about borough residents** (eg the borough equality information published on the Council website at <http://www.reigate-banstead.gov.uk/equality>, service user surveys etc)
  - **Relevant information published by third party organisations** (eg data, research studies etc)
  - **Feedback or information from organisations representing target equality groups**

### **4.1 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal, including sources, titles and dates where possible**

The Council has five community development areas where community development workers provide support to the community (residents and organisations) to help them to develop local services / support activities, to enable enhanced access to existing services and to focus activity to help address issues such as deprivation and isolation.

The five community development areas broadly align with the most deprived part of the borough as identified by the Index of Multiple deprivation and are: Horley, Redhill, Merstham, Preston, and Woodhatch and Whitebushes. Information about resident characteristics in these areas is included in the Borough Equality Characteristics report published on the website.

As noted above, the immediate impact of this proposal is that recruitment to the vacant Woodhatch and Whitebushes CDW post will not be undertaken. However, the intention of the post deletion is not to cease activity in this specific area; rather that a review will be undertaken of community development activity across the borough to make sure that the

remaining resources continue to be targeted effectively across those communities in the borough requiring most support to advance equality of opportunity.

Annually, each Community Development worker produces an annual impact report explaining where their activity has been focused over the past year and the achievements that have been secured.

Given the potential immediate impact on the Woodhatch and Whitebushes area, some key pieces of evidence about the need and focus of work in this area to date are provided below. This information (along with similar information for the other CD areas) will form evidence to inform the review mentioned above.

**‘Listening Exercise’ 2019:** Undertaken to evaluate the need for community development workers in the area, this:

- Identified local issues as being: parking and road safety; economic deprivation, community safety/drug misuse, insufficient child/youth provision, poor physical environment and social isolation
- Identified local barriers as being: Little social cohesion; community assets not fully utilised; lack of localised partnership working; residents feeling unsafe
- Identified high priority areas of focus for the community as: developing greater social cohesion and increasing community engagement; further use of community bases; urgently increasing access to quality and targeted provisions for children, young people and their families; addressing resident employability.

**Woodhatch and Whitebushes Action Plan (2021):** Developed with local partners this identifies lack of youth provision, social isolation and anti-social behaviour as issues of concern to those living and working in the area. Coordinating addressing these issues was a central role of the CDW

**Woodhatch and Whitebushes CDW annual impact reports.** By way of example as to the focus of the CDWs work, in 2020, this included setting up local social media platforms, developing a partnership and volunteering networks, bringing into use new local venues and running events in partnership with local people and organisations, and setting up a local food club. In 2021, activity included securing the development of a new pump track, launching a community fridge, running events and litter picks and securing environmental improvements

#### **4.2 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?**

Yes

***If you have answered ‘yes’, please explain what the gaps are and suggest how those gaps could be filled in the future***

Much of the evidence about the effectiveness and need for the CDW is anecdotal due to the interpersonal nature of the work. Future opportunities exist to gather qualitative information based on local feedback. In the longer term, established measures such as the indices of

multiple deprivation provide a metric to track the overall 'direction of travel' within communities

At the moment it is not known what the outcome of the review to consider the future focus of the Community Development Team will be. This will not be known until the review is well progressed.

## 5. Assessment of potential impact of the proposal

### 5.1 Does your proposal relate to a service or function which evidence or information indicates is important to those with protected characteristics?

Yes

***If you have answered 'yes', please outline the issues -these could include (for example) access to information or the ability to use or access a particular service)***

CD work is targeted at our most vulnerable and deprived neighbourhoods. CDWs work with individuals - predominately with those with a disability (in particular those living with mental ill health) – to signpost to and assist in accessing support. They also support local communities to develop projects, which these and other residents participate in and benefit from.

In the Woodhatch and Whitebushes area a particular focus for projects has been in relation to working with partners to grow support for young people. In the immediate term, there will be no dedicated CDW in place to take this work forward, except where this can be resourced to a limited degree from elsewhere in the team.

In the medium to longer term, it is not yet confirmed how resources in the Community Development team will be focused – the potential future impact will not therefore be able to be assessed until the planned review has been progressed.

### 5.2 Will the proposal intentionally target any particular protected characteristic group?

No

***If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is***

n/a

### 5.3 Will the proposal intentionally exclude any particular protected characteristic group?

No

***If you have answered 'yes', please identify which group(s) are targeted and explain the reason for this and what the intended impact is***

n/a

**5.4 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?**

See comment

***If you have identified that there may be barriers, please identify these. Barriers may be physical, digital, social or cultural.***

The proposal has been added to the existing budget proposal towards the end of the budget setting process, and therefore has not been subject to public consultation.

This means those who may have directly benefitted from the work of the CDW in the Woodhatch and Whitebushes area (or more generally) will not yet be aware of the deletion of this post nor will they have been able to provide comments about how it might affect them. (see also 6.1 below)

**5.5 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?**

No potential positive equality benefits have been identified

Proposal relates to reduction in level of staff resources available to deliver the community development service

**5.6 Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both)**

***This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information. More information about the protected characteristic groups is available at <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>***

**a) Age, including children, young people or older people**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Work in all our CD areas, including Woodhatch and Whitebushes, has included a focus on positive outcomes for young people including increase leisure and sports activities, holiday food provision and the ability to get their voice heard and make a difference locally, Without CDW support these outcomes may not be achieved or may be achieved to a lesser extent.

In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. As noted above part of the role of the CDW is to provide direct support to vulnerable local residents, which may include older residents. Another part of the role is also to progress projects to benefit the local community, with one focus in this area being projects that benefit younger people. To mitigate any immediate negative impact

of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily and community support will continue to be provided via the Council's Woodhatch Community Centre.

Alongside this proposal, work will be undertaken proposed to review and potentially refocus the Council's community development activity to ensure it continues to provide support for the communities that need it most and to advance equality of opportunity for residents. Until this review has been undertaken it is not possible to identify whether any change in the way resources are targeted will have any impact on those protected by virtue of any protected characteristic. For this reason, as set out below, consideration of equality issues will be part of this review.

**b) Disability, including physical, sensory or learning disability or long-term health impairment**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

CDW's in all our areas, including Woodhatch and Whitebushes, has included building strong local profiles and trust with residents which leads to them being approached by marginalised people, particularly those experiencing mental ill health for support to access services.

In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. As noted above part of the role of the CDW is to provide direct support to vulnerable local residents, which may include those with physical or mental health impairments or disabilities. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily, and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above.

**c) Gender reassignment**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Supporting gender reassigned or transitioning residents is not a specific focus of the Council's community development work in Woodhatch and Whitebushes, however residents in this group may have some engagement or benefit from the presence of community development workers.

In the immediate term, the impact is anticipated to be neutral. Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above.

**d) Marriage and civil partnership**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Supporting married residents or those in civil partnerships is not a specific focus of the Council's community development work in Woodhatch and Whitebushes, however residents in this group may have some engagement or benefit from the presence of community development workers.

In the immediate term, the impact is anticipated to be neutral. Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above.

**e) Pregnancy and maternity**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The CDW in Woodhatch and Whitebushes has a strong relationship with a local CIC supporting pregnant women and new families to increase provision at the Woodhatch Centre and potentially in Whitebushes if a suitable venue could be found.

In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. As noted above part of the role of the CDW is to promote and enhance local services and provide signposting to these. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily, and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

**f) Race or ethnicity**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents in this protected characteristic group may have some engagement or benefited from the presence of community development worker in Woodhatch and Whitebushes. In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that



some activities can continue, albeit temporarily, and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

**g) Religion or belief**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Residents in this protected characteristic group may have some engagement or benefited from the presence of community development worker in Woodhatch and Whitebushes. In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily, and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

**h) Sex**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Supporting residents for reasons specific to their sex is not a specific focus of the Council's community development work in Woodhatch and Whitebushes.

In the immediate term, the impact is anticipated to be neutral. Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above.

**i) Sexual orientation**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

Supporting residents for reasons specific to their sexual orientation is not a specific focus of the Council's community development work in Woodhatch and Whitebushes however residents in this group may have some engagement or benefit from the presence of community development workers.

In the immediate term, the impact is anticipated to be neutral. Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

**j) Deprivation**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

All our CD areas are identified in relation to the Indices of Multiple Deprivation as an indicator of additional need. The IMD has allowed us to identify potentially vulnerable communities at super output area. Woodhatch and Whitebushes both contain super output areas in the 15 most deprived areas in the Borough.

In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily, and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

**k) Other vulnerable group,**

**What is the nature of the impact?** Not sure

**Please briefly explain your answer below. Include whether any impact is direct or indirect and which group(s) may be impacted and how:**

The work of all CDWs, including in Woodhatch and Whitebushes, is aimed at supporting vulnerable communities and individuals and improving their ability to design and deliver solutions to the issues they face.

In the immediate term, the proposal means that the vacant Woodhatch and Whitebushes CDW post will not be recruited to. To mitigate any immediate negative impact of the vacant post not being filled, limited resources have been diverted from elsewhere in the team, meaning that some activities can continue, albeit temporarily and community support will continue to be provided via the Council's Woodhatch Community Centre.

Impact in the medium to longer term cannot be fully understood for the reasons identified in 5.6(a) above

## **6. Consultation and mitigating action**

### **6.1 Has there been any consultation with relevant interested parties or is any consultation planned?**

Consultation is planned

***Please explain the nature of any consultation that has been undertaken or is planned. How were protected characteristic groups consulted or how will they be consulted?***

Consultation has not been undertaken on this budget proposal (and its associated impact) as the proposal has been included towards the end of the budget setting process. Therefore no direct consultation with partners or residents in Woodhatch and Whitebushes has been undertaken.

As noted in section 7 below, it is planned to engage with the local partnership network in the area (including those representing resident with protected characteristics) to assess the impact of the deletion of the CDW post on the Woodhatch and Whitebushes community in the immediate term, and with a wider audience to inform planning for the future focus of the CD service within the Council.

***Please summarise the outcomes of any consultation. You may also include this in the 'Data & Evidence' section above***

Not applicable, see above

***If no consultation has been undertaken and none is planned, please explain why consultation is not considered necessary?***

See above - consultation has not been undertaken on this proposal as part of the 2022/23 budget consultation due to the late stage at which the proposal has been included. However, engagement with local representatives is planned in order to assess the impact of the proposal, consider potential mitigation measures and inform the review into what the future focus of Council community development activity should be.

## **6.2 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?**

***This could include changing or amending the proposed approach***

A longer lead in time for the deletion of the post would have allowed the review of the Council's overall CD focus to be further progressed, however the timing of the post becoming vacant was outside the Council's control. Ongoing service planning activities will review the priorities for CDW support within the borough and the resource available within the Council in order to ensure that this is appropriately targeted in the future and delivers maximum benefits for local people and advances equality of opportunity, in particular for those living in vulnerable and deprived communities and including those with protected characteristics.

## **6.3 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?**

***This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances***

The following actions have been identified to mitigate the immediate impact of not recruiting a replacement community development worker for Woodhatch and Whitebushes:

- Other members of the CD team are currently covering the delivery of existing projects within the Woodhatch and Whitebushes area, to ensure that these are seen through to

completion and to remove any potential negative impact from these activities ceasing in the immediate term.

- As noted in section 7, it is planned to engage with local partners in the Woodhatch and Whitebushes area to assess the immediate local impact of not recruiting to the vacant post and consider any other mitigation measures that can be put in place to support the sustaining of some CD work in that area.

In addition:

- A review of current need across all the Council's CD areas will inform a decision on how remaining CDW resources are targeted in the medium to longer term. This will consider the range of relevant evidence, including patterns of deprivation or other vulnerabilities, and the needs of those with protected characteristics, as well as the outcomes of the monitoring activity identified in section 7 and the role of other Council / partner support available (eg community centres). For example, ahead of the appointment of the CDW a 'listening phase' was conducted with consultants talking to local residents and stakeholders which identified the need for a CDW. A repeat of this or a similar exercise could help establish if there is still a need for CDW activity in those parts of the borough that are currently supported.
- Opportunities to secure resources from other organisations to complement, fund or otherwise support the Council's community development activity in the future will be explored.

## 7. Monitoring and review

### 7.1 How do you propose to monitor and review the impact of your proposal?

***Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)***

We will speak to partners at a planned network meeting in March to assess the immediate impact of not recruiting to the Woodhatch and Whitebushes CDW post and identify how other organisations may be able to support the Council's community development workers to continue existing projects /support in the area and mitigate the immediate impact on the local community.

Incoming enquiries to the Council about community support will be monitored by the Community Partnerships team working with the customer contact team to determine if other need is arising and then to engage with partner organisations in developing proposals to respond to that need.

The Council will use this information, local feedback from partner organisations and/or residents, and local data and evidence (including that relating to the needs of those with protected characteristics or who are otherwise vulnerable) to inform its review of how it focuses community development activity across the borough in the future to ensure that resources are targeted to best effect and to advance equality of opportunity. Should this

review identify that any additional resources are required, funding will be sought either via the annual budget setting process, in-year from relevant earmarked reserves or from third party sources.

## 8. Conclusions

This section should be completed in support of the final proposal that is being presented to decision-makers

### 8.1 Taking into account any mitigating actions, are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?

*For example, physical, cultural or information access issues that cannot be resolved.*

No

*Please explain your answer. If negative impacts will remain please briefly explain these:*

Measures have been identified to seek to mitigate any immediate impact of not recruiting to the Woodhatch and Whitebushes CDW vacancy. (see sections 6 and 7 above) There remains uncertainty about medium to longer term proposals to deliver community development activity across the borough pending a review.

The Council will take an evidence based approach to consider the need for CDW support across the borough and its available resources, to determine future direction. As part of this, the particular needs of, and impact on, residents with protected characteristics and other vulnerabilities, and the Council's responsibility to advance equality of opportunity, will be considered.

### 8.2 Is any remaining negative impact legal or intended?

*The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/justifying-discrimination>). However, this should always be a last resort*

Not applicable, no remaining negative impact

### 8.3 Any remaining negative unintended impacts must be drawn to the attention of the decision maker (for example, the relevant Board or Committee)

The following must be considered by decision-makers before any final decision is made:

- Does the assessment indicate any direct discrimination? If yes, the proposal would be unlawful and must be rejected.
- Does the assessment indicate any indirect discrimination? If yes, the proposal should be rejected unless it can be justified under legislation, for example:
  - It is necessary to the Council effectively carrying out its function
  - The Council has been unable to find an alternative method of achieving its aims and objectives with a decreased discriminatory effect

- The decision-maker considers that the means employed to achieve its aims and objectives are proportionate, necessary and appropriate.

In the event that there are negative impacts remaining and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed.