

Appendix 4 Equality Assessment - Guidance and Recording Form

1. Introduction

Redditch Borough Councils is committed to providing equality of access and recognises that discrimination does not need to be intentional for unfair treatment or adverse impact to occur. Our approach to equality recognises that the range of different groups in our society may have different needs and we seek to ensure that our services are fairly and equitably provided to all sections of the community.

We *are* **legally required** (The Equality Duty, The Equality Act 2010) to demonstrate that we have given 'due regard' to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

This means that equality considerations need to be evidenced in our decision-making processes and policies. This template will support you to evidence how the Duty has been taken into account. The Equality duty is to meet 'needs', rather than any desires or preferences for a particular treatment or service. Complying with the General Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive actions provisions in order to provide a service in a way which is appropriate for a particular group. The General Duty also explicitly recognises that disabled people's needs are different from those of non-disabled people. In considering the requirements to meet the needs of disabled people, public bodies should therefore take account of disabled people's disabilities. This might mean making reasonable adjustments for them or treating them better than other people.

2. When is Equality Assessment required?

Any potential impact on equality should be considered **before any key decisions are made** and should be integrated into day-to-day policy-making, business planning and other decision-making arrangements. This is particularly relevant when making difficult financial decisions; if we are proposing to **stop, reduce or change a service** then we must have relevant equalities evidence to justify this.

Due regard means consciously thinking about the three aims of the General Duty as a part of the process of decision-making. This means that consideration of equality issues must influence the decisions we make, when:

- Developing, evaluating and reviewing policy
- Designing, delivering and changing services
- Commissioning and procuring from others

You must consider what evidence is available and whether any more information is needed. You cannot assume that a policy will benefit all service users without evidence to support that conclusion. It is not necessary in every instance, to have hard statistical data. We can also use more qualitative sources such as service user feedback or external sources, for example, information available from the Equality and Human Rights Commission, local or national representative groups etc. Local, regional or national statistical information and research may also be used if relevant.

3. How is the Equality Assessment to be carried out?

To assess a service or policy, consider and use any or all of the following options:

- Walk through the processes as a customer would, or as a member of staff and test it from their point of view - this can be done by the service manager or jointly with the team. Record this experience and make a record of any actions required as a result.
- Set up a customer test with volunteers from community or staff groups. Get them to access the service from start to finish, assess their experience and feedback. Make a record of what was discovered, who the group members were and any actions required as a result.
- Conduct statistical analysis from any service usage information available or customer satisfaction surveys looking for patterns of usage by defined equality groups and obvious gaps in usage.

If further evidence comes to light after the initial completion of this assessment, if possible, go back to the original assessment and update it. Equality Assessment should be seen as a living, on-going process rather than a one off exercise.

4. Who carries out the assessment?

The manager of the service is responsible for ensuring that the assessment is carried out and recorded on this form.

A list of every completed Equality Assessment will be published on the relevant Council's website. Any Elected Member or member of the public can ask for copies of the assessment and any information that has been used in the completion of the assessment.

For further information or assistance please contact:

Policy Team on 01527 548284 or 01527 881616 or equalities@bromsgroveandredditch.gov.uk

Useful documents:

[Bromsgrove](#) Equality Strategy

[Redditch](#) Equality Strategy

Quick start guidance to the Equality Duty can be found [here](#)

Equality Assessment Record

Please ensure the following:

- That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

Title of service/policy/procedure/spending review being proposed	One Stop Shop Review		
Name of service area	Customer Services		
Name of Officer completing this assessment	Paul Stephenson		
Date assessment completed	14/11/19		
Name of decision maker (in relation to the change)	Executive		
Date decision made			
Sign off on completion	Name	Signature	Date
Lead officer completing assessment	Paul Stephenson		14/11/19
Equalities	Rebecca Green (Policy Manager)		14/11/19

Overview – Set the context

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

The proposal recommends closure of the Customer Service Centres (known as One Stop Shops) at Batchley, Winyates and Woodrow. The reasoning behind the case for closure is that over the past 10 years, visitor numbers have fallen significantly due to changes in working practices at the Town Hall, and within each service area. This has resulted in the One Stop Shops mostly being used solely to pay their council bills (mainly Rent and Council Tax), incurring a high cost for the council in regards of staffing and overheads.

Customers who wish to pay their rent in person can now use a rent payment card which is accepted at a Post Office or Paypoint location. This will be a better, more effective alternative as they are open longer hours than the One Stop Shops (OSS are only open for ½ day Monday-Friday). There are at least 1 Paypoint or Post Office within the centres at Winyates, Woodrow and Batchley. Customers who wish to pay their Council Tax in person will shortly be able to pay using their bill at any Post Office or Paypoint location.

Housing appointments will be conducted in the existing locality buildings, in customer homes or at the Town Hall or any other council premise subject to customer need.

The suggested date of closure is April 2020 and the roll-out of barcoded billing is planned for January 2020.

All of the alternative payment methods (direct debit, 24 hrs automated telephone line, bank standing order, postal cheque, online payment) are still available as alternatives.

Customers who need to contact the council for advice can still continue to use alternative methods of contact such as telephone, email, via the internet or visiting the town hall.

Who is the proposal likely to affect?	Yes	No
All residents	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Specific group(s)	<input type="checkbox"/>	<input type="checkbox"/>
All Council employees	<input type="checkbox"/>	<input type="checkbox"/>
Specific group(s) of employees	<input type="checkbox"/>	<input type="checkbox"/>
Other (identify)	<input type="checkbox"/>	<input type="checkbox"/>

Detail- Outline who could be affected, and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

Adults with disabilities – will be able to use post office/Paypoint in each of the centres to pay for their services, or alternatively can use on of the alternative payments in the overview, or visit the town hall where disabled parking spaces are provided free of charge or via local buses which are adapted for people with disabilities. In certain circumstances, home visits are also a possibility for customers who would find accessing any other means of contact difficult, at the discretion of the relevant service area.

Adults with young children – will be able to use post office/Paypoint in each of the centres to pay for their services, or alternatively can use on of the alternative payments in the overview, or visit the town hall.

Older people – will be able to use post office/Paypoint in each of the centres to pay for their services, or alternatively can use on of the alternative payments in the overview, or visit the town hall.

The service will now benefit people with disabilities, adults with young children and older people all across the Borough, as there are numerous post offices/Paypoint locations. This will enable the predominant services currently provided by the One Stop Shops (Paying rent & Council Tax) to be accessed by people in their own localities.

Evidence and data used to inform your equality impact assessment

What **data, research, or trend analysis** have you used? Describe how you have got your information and what it tells you.

Equality data is not gathered on service users accessing the One Stop Shops, however a recent survey has shown that 85% of visitors to the centre come to pay for council services, 10% come to ask a question of the Customer Service Advisor and the remaining 5% either use the telephone or attend a pre-arranged appointment.

Results from the 2018 Redditch Community Survey
43% of people stated their main method of contacting the council was by telephone
Further 20% said preferred method was website
Only 6% said their preferred method was face to face

Engagement and Consultation

What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs?

How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

A survey was conducted with 267 customers of the One Stop Shops in July and August 2019, to ascertain their reasons for using the One Stop Shops.

This showed that 85% of visitors to the centre come to pay for council services, 10% come to ask a question of the Customer Service Advisor and the remaining respondents either use the telephone (13 people) or attend a pre-arranged appointment (4 people).

Public Sector Equality Duty

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making. Consider the current service and any proposed changes, thinking about what issues may arise.

Equality Duty aims	Evidence
<p>Eliminate unlawful discrimination, harassment and victimisation How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>	<p>Evidence shows that 85% of the people using the One Stop Shops come to make a payment. Although the proposal is to close the One Stop Shops, in order to reduce any negative impact, the proposal is that customers can make their payments at other local locations via the Post Office or Paypoint. This has in fact <i>increased</i> the accessibility to this part of the service for everyone, as there are more places across the Borough they can use and opening times are longer.</p> <p>All of the alternative payment methods (direct debit, 24 hrs automated telephone line, bank standing order, postal cheque, online payment, payment in person at Redditch Town Hall) are still available as alternatives.</p> <p>Customers who need to contact the council for advice can still continue to use alternative methods of contact such as telephone, email, via the internet or visiting the Town Hall.</p>
<p>Advance equality of opportunity between different groups How does the proposal/service</p>	<p>With customers able to make their payments at other local locations via the Post Office or Paypoint, accessibility to this part of the service has become more accessible for everyone, as there are more places they can use and opening times are longer.</p>

<p>ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p>	
<p>Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p>	<p>n/a</p>

Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
 - Does it affect some equality groups or communities differently and can this be justified?
 - Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)

Impact of proposal- Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

Protected Group	Impact of proposal	Justification for any actual or potential unfairness identified	If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?
Age	High	Mitigating actions being	See actions below

	<ul style="list-style-type: none"> • Removal of local, well established Council office for payment could be worrying or confusing • Older residents might not be aware of alternative methods of engaging with the Council 	implemented	
Disability	High <ul style="list-style-type: none"> • Removal of local, well established Council office for payment could be worrying or confusing • Some residents with disabilities (& potentially carers) might not be aware of alternative methods of engaging with the Council 	Mitigating actions being implemented	See actions below
Transgender	n/a	n/a	n/a
Marriage and Civil	n/a	n/a	n/a

Partnership			
Pregnancy and Maternity	High <ul style="list-style-type: none"> • Removal of local, well established Council office for payment could be worrying • Some new mothers might not be aware of alternative methods of engaging with the Council 	Mitigating actions being implemented	See actions below
Race	Medium	Mitigating actions being implemented	See actions below
Religion or Belief	n/a	n/a	n/a
Sex (Male/ Female)	n/a	n/a	n/a
Sexual Orientation	n/a	n/a	n/a

How will you monitor any changes identified?

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered

The actions required to address these findings are set out below.

Action Required	By Whom	By When	Completion Date
Rent card implementation	Paul Stephenson	11/11/19	11/11/19
Council Tax barcoded billing	Paul Stephenson	02/12/19	
Communication on changes with One Stop Shop customers	Paul Stephenson	01/01/20-05/04/20	
Wider communication of changes with communities, including targeted messages to community groups/venues and translated materials as required	Paul Stephenson Rebecca Green	01/01/20-05/04/20	

When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.

Glossary

Direct discrimination

- Treating someone less favourably than someone else in the same circumstances, e.g.:
 - In employment, racist or sexist banter, derogatory comments and innuendo
 - Failure to treat grievances seriously or to investigate effectively

- Unfairly denying access to employment, training or facilities and services

Indirect discrimination

- Where a provision, criterion or practice is applied equally to all but has the effect excluding or reducing the access for a particular group and is not a proportionate means of achieving a legitimate aim. Even if this effect is unintentional, it can still be unlawful, e.g.:
 - Unnecessary height restrictions for access to employment opportunities
 - Refusing training for promotion to people who work part-time
 - Requiring fluency in a language where this is not necessary
 - Relying on word of mouth to recruit to employment or training opportunities
 - Qualification requirements that are not justified for the level of the job.

Policy, Practices and Services

- Refers to any activity the council does, be that a service we provide, an initiative we run, a policy we write or a procedure we observe.
- It may refer to the way we do things which are customary
- It may refer to activities we undertake such as meetings, focus groups or publications we produce.

Protected Characteristics

Age - consider all age groups although legal protection only applies to people aged 18 or over

Disability - consider all types of impairment, physical and mental, sensory, visible and hidden

- | | |
|---|---|
| <ul style="list-style-type: none"> • Learning disability • Families and carers of disabled children • Mobility impairments • Wheelchair users | <ul style="list-style-type: none"> • Mental health needs/ disorders and psychological conditions • HIV/ Aids • Sensory impairments such as sight and hearing • Cancer and long term progressive conditions such as MS |
|---|---|

Gender – refers to the physiological fact of being male or female

- consider whether something has a different impact on men or women - particularly if it's more of an impact on women, consider the impact if they have caring responsibilities whether its childcare or other types of care

Gender re-assignment - Transgender (Gender Dysphoria)- or the preferred term, Gender Confirmation

- Consider all stages of re-assignment, before, during and after re-assignment treatment or gender confirmation surgery

Marriage and Civil Partnerships –

- It *only* covers those who are married or in a civil partnership (NB single status is not protected in the Equality Act)

Pregnancy and maternity

- Physical state of pregnancy
- On maternity leave or planning maternity leave or returned from maternity leave
- Includes breast feeding

Race – this includes race, colour, nationality, national or ethnic origin and caste (caste through case law, not explicitly referenced)

- Race is a generic overall term
- Colour refers to the colour of a person's skin
- Nationality applies to internationally recognised nationalities
- National Origin applies where you have changed your nationality in your life time or there is something about you that indicates that your parents or grandparents' origins were in another part of the world – e.g. name, religion
- Ethnic Origin applies where identifiable groups have established a unique and different ethnicity to the rest of the population – this currently applies to Jews, Gypsies, Sikhs Irish and Scottish Travellers
- Caste is the traditional organisation of South Asian, particularly Hindu, society into a hierarchy of hereditary groups.

Religion or Belief – all established religions and beliefs (and non-belief) including but not limited to the following:

- | | | |
|----------------|---------------------------|------------------|
| • Christianity | • Baha'i | • Rastafarianism |
| • Hinduism | • Buddhism | • Atheism |
| • Islam | • Jainism | • Agnosticism |
| • Judaism | • Paganism | • Humanism |
| • Sikhism | • Parsi or Zoroastrianism | |

Sexual orientation

- Gay – usually refers to men with sexual orientation towards other men although sometime refers to women with sexual orientation towards other women
- Lesbian – refers to women with sexual orientation towards other women
- Bisexual – refers to men and women with sexual orientation to either or both their own gender or the opposite gender
- Heterosexual refers to men and women with sexual orientation towards the opposite gender