

## **Cumulative Equalities Analysis**

### **1.0 Purpose**

- 1.1** To provide a cumulative Equality Analysis of the Budget proposals 2014/15 in line with the Public Sector Equality Duty.

### **2.0 Background**

- 2.1** Wolverhampton City Council needs to make a savings of £123 million by 2018. This savings gap is very challenging, and takes into account further anticipated cuts in Government grants along with other pressures on the council's budget such as an increasing demand on services from a growing diverse population. In order to achieve this savings we have produced and published a number of budget proposals.
- 2.2** Wolverhampton City Council's vision is to deliver great services and making life better for all. This is summed up in our statement of purpose "Serving Wolverhampton, Securing Prosperity, Delivering Value". The vision for Wolverhampton is to be a city where the local economy is strong and sustainable, delivering prosperity for all.
- 2.3** The Council's Corporate Plan is the council's key strategic document and the vital link between council business planning and the City Strategy. The Corporate Plan supports in the delivery of the key themes set out in the City Strategy, which are:
- Encouraging Enterprise and Business
  - Empowering People and Communities
  - Re-Invigorating the city
  - Being a Confident Capable Council
- 2.4** Wolverhampton City Council is committed to advancing equality and valuing diversity by identifying ways of mainstreaming, promoting and advancing best equalities practice, enabling the council to improve and effectively target our services and to ensure we recruit and retain the best staff.
- 2.5** To ensure that we are doing this effectively, the council has identified and consulted on a set of equality objectives and are stated in our Equal Opportunities Policy Statement. These objectives are detailed further on in this report.

### **3.0 Equalities at Wolverhampton City Council**

- 3.1** Compliancy of the general and specific duties of the Equality Act 2010 helped support and develop the councils Equality Objectives which are:
- **All services**  
Take practical steps to ensure services are accessible and appropriate for all communities. Establish a corporate system for collecting and monitoring equality information about our customers.

- **Commissioning**  
All of the Council's commissioning and procurements processes take account of equality issues. All contracts include a requirement to deliver an effective and appropriate service fairly and equitably.
- **Engagement**  
Increase opportunities and strengthen mechanisms for under-represented communities / groups to be involved in developing policies and making decisions that affect them.
- **Impact**  
Assess the equality implications of all of our services, functions, policies and procedures.
- **Workforce**  
Develop our monitoring systems to improve our performance in identifying any inequalities or barriers to the employment of any group in our workforce.  
Promote positive initiatives to address any inequalities or barriers in the demographic of Wolverhampton City Council's workforce.

**3.4** There is a Councillor Champion for equalities, who chairs the Equalities Advisory Group. This Councillor forum has overseen the development and roll out of an Equalities work programme. This has been implemented in 2013, and included the development and roll out of the e-learning equality and diversity training, an equality analysis toolkit and the establishment of a corporate equalities steering group.

#### **4.0 Equalities and the Law**

**4.1** The public sector equality duty was created by the Equality Act 2010 and replaces the race, disability and gender equality duties.

The new duty applies to age, disability, gender reassignment, pregnancy and maternity, race, religion and belief, sex and sexual orientation and to a more limited extent, to marriage and civil partnership.

The Equality Act 2010 needs to be interpreted in a way that is compatible with the Human Rights Act 1998 unless it is impossible to do so.

The Public Sector Equality Duty requires the Council to have "due regard" to the objectives set out in section 149 of the Equalities Act 2010, when exercising any of its functions. This includes when considering and making decisions on budget savings proposals. "Due regard" means the regard that is appropriate in all the particular circumstances in which the Council is carrying out its functions.

**4.2** In summary, the Equality Duty requires the Council to have due regard to the need to eliminate discrimination, and both (a) to advance equality of opportunity as well as (b) to foster good relations, in each case between persons who share one or more of the "protected characteristics" and persons who do not share it. The protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; Gender (ex); sexual orientation; and marriage and civil partnership.

**4.3** The Equality Duty is not necessarily to achieve the objectives or take the steps set out in section 149. Rather, it is designed to bring these important objectives relating to discrimination and equality into consideration when the Council is setting policies or making decisions.

**4.4** Where it is apparent from the analysis of the information before the Council that a proposed policy or decision would have an adverse effect upon equality, then adjustments should be made to avoid that affect, i.e., mitigation. Furthermore, compliance with the Equality Duty may involve the Council treating some people more favourably than others.

**4.5** At the same time as paying the necessary “due regard”, Councillors must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Budgetary pressures, economics and practical factors will often be important. The weight of these countervailing factors in the decision making process is a matter for Councillors, subject to the principles of public law.

## **5.0 Equalities in the 2014 Budget Setting Process**

**5.1** In October 2013 all 177 savings proposals were considered for their impact on equality. Each proposal had an initial equality screening. 46 of these 177 proposals required further analysis.

**5.2** These 46 proposals were then more rigorously considered for their impact on the same equalities considerations.

A full equalities analysis was completed on the 46 proposals, which offered the opportunity to consider more deeply and broadly the equalities implications of the proposal.

**5.3** The potential for adverse impact; for indirect or direct discrimination along with the possibility for advancing equal opportunity and for fostering good relations was considered in each analysis. An equalities analysis summary has been completed for each of the 177 savings proposals.

## **6.0 Demographic of equality strands**

### **National and local context**

In common with other urban local authorities, Wolverhampton has considerable cost and demographic pressures which form the backdrop for considering equalities in the city. Some of these pressures do affect some equalities groups disproportionately (such as the reduction in disability-related benefits), but other pressures affect all residents regardless, such as the reduction in Government grant.



There are particular issues around deprivation in Wolverhampton which intersect with several equalities strands. 53% of the city's population at the time of the 2011 Census lived in areas classified as being in the top 20% most deprived within England in the 2010 Indices of Deprivation.

Analysis of Census data in terms of deprived and non-deprived areas shows deprived areas tend to have a younger population, more BME residents, more residents with poor health, more in social rented housing, more with low qualifications, lower levels of employment, and the residents who have jobs tend to have low-status jobs. It is important not to consider equalities in isolation from geographical factors such as the quality of the local area, as that will have a bearing on life chances for residents, even down to life expectancy differences between areas of the city.

There are some protected characteristics which are mentioned very little in this report, such as gender reassignment, pregnancy and maternity and marriage/civil partnership. This may be because these groups are not specifically disproportionately affected by the savings proposals, but also may be because monitoring systems are not yet in place to monitor these groups.

## Disability

### Key facts

- 21% of Wolverhampton's residents are limited 'a lot or a little' in their day to day lives
- Women are more slightly more likely to be disabled, as well as those over 50 years of age. Therefore this group are most likely to need adult social care.
- Disabled people in Wolverhampton are less likely to have a high status job than non-disabled people
- They are also more likely to be long term unemployed, or never have a job (15%). Although this figure seems reasonably low, it includes those who are only 'a little' limited in their day to day life. Nationally, fewer than 50% of disabled people are employed.
- Nationally, disabled people are twice as likely to live in poverty
- The national Welfare Reform programme will see big changes for disabled people, with Disability Living Allowance becoming Personal Independence Payments, and changes to the Independent Living Fund, Access to Work and Employment Support Allowance.

## **Gender**

### **Key facts**

- Women head up 90% of single parent families in Wolverhampton
- Women in Wolverhampton are far less likely to be in the highest managerial employment than men (3.6% compared to 8%)
- They are also more likely to be long term unemployed or have never worked (11.5% compared to 8.6%)
- Women are more likely to rely on state funded benefits to live
- Women are more likely to be carers

## **Race**

### **Key facts**

- 36% of Wolverhampton's citizens are non-White
- BME residents are less likely to be employed in the top three bands of occupations, including management
- They are also far more likely to be long term unemployed or never have worked (14% compared to 8% of white British)
- Nationally, around two-fifths of BME people live in low income families, double the rate for white families.

## **Age**

### **Key facts**

- There were 20,000 Wolverhampton citizens over the age of 75 in 2011
- This is expected to rise by 15% in the near future, creating huge pressure on adult social care budgets
- 14% of people under 25 in Wolverhampton are long term unemployed or have never worked
- There are about 750 Looked After Children in Wolverhampton, costing the authority around £25 million each year
- 32% of children in Wolverhampton live below the poverty line

## **7.0 Cumulative summary of impact of savings proposals on equality strands**

**7.1** This section outlines the cumulative impact of the savings on groups with protected characteristics. The impact on these people has been classified under the corporate plan priorities. The vast majority of the savings are aligned under 'Empowering People and Communities.'

## **8.0 Encouraging Enterprise and Business**

There are a number of savings proposals which have gone through the equalities screening process which were not considered to require a full equality analysis, as the initial screening indicated that there would be no impacts on service users proscribed by the PSED.

Under the corporate priority of 'Encouraging Enterprise and Business', these savings are mostly due to restructures or removal of vacant posts in teams such as Planning and

Physical Regeneration. Although these will affect employees, they were not considered to impact on service users in a way proscribed by the PSED will not affect service users and precautions will be taken by Human Resources to ensure there is no proscribed employment impact.

There are few savings proposals which will affect groups with protected characteristics and therefore require a full equalities analysis that fall under the theme of 'Encouraging Enterprise and Business'. The parking services review will offer free parking to all blue badge holders, which may incentivise the use of disabled parking spaces and encourage disabled people to come to the city centre. During the corporate budget consultation, there was concern that the reduction in rate relief may dis-incentivise the transfer of community assets to voluntary groups. Existing community groups may be unable to continue due to increased costs of utilising properties which may have an impact on service users.

## **9.0 Empowering People and Communities**

There are a number of savings proposals which fall under this corporate priority which were screened for equalities impact and found to be unlikely to cause disproportionate impact. Similarly to above were not considered to impact on service users in a way proscribed by the PSED, most of these proposals focus on staff restructures, which will not impact upon the end user in a disproportionate manner. Some teams will have the number of posts reduced, including management and administration posts. Others will be restructured to focus primarily on statutory duties, such as the Schools Skills and Learning team, and the Sports Development team will be incorporated into the Public Health workforce. Some services will be provided by alternative teams, for instance the New Operating Model will remove the need for the Family Action and Support Team. Savings have been found by securing budgets in a different way, such as commissioning Early Years and Children's services through Public Health, and increasing the cost of school meal provision to schools (who can choose whether to pass on the charge to parents) and the cost of the Educational Library service to schools. Some efficiencies will be achieved through an increased uptake of services, for example the intended increased numbers of school meals produced.

Care for older people will be reassessed to ensure that the care provided is appropriate, both in the case of high cost care packages provided by private firms and by reviewing care packages more promptly after hospital discharge. Complex care packages for older people will be reviewed to ensure that health services are contributing the correct proportion of funding. Such reassessments will not disproportionately impact certain groups and should help to ensure the appropriate level of care is provided. There will be an increased focus on assistive technology.

Some services will be delivered in a different way but in one which will not impact certain groups disproportionately. These include the strengthening of community-based alternatives to residential care for older people.

Business support savings have also been identified, such as technological improvements and a reconfiguration of mail services, and the relocation of the Revenue and Benefits team.

Such savings are unlikely to affect service users disproportionately. Therefore they were not eligible for a full equality analysis.

The majority of savings proposals which required a full analysis relate to the corporate priority of 'Empowering People and Communities'. These are detailed below. As this provision serves vulnerable people, it is expected that groups with protected characteristics may be affected more by these changes than savings in other areas.

## **9.1 Older People**

Changes to day care and domiciliary services will focus on independent living wherever possible. Some older people will need to contribute more for their domiciliary care. The government's policy of 'Fairer Charging' means that the Council is unable to establish differential rates based on equality strands. However, all older people will now be able to access the Welfare Rights team, who will help to maximise their income from benefits. In keeping with the agenda of increased independence and flexibility, personal budgets will enable older people to have more choice over their day care provision. Many of the savings proposals regarding care services consist of re-tendering or outsourcing care, which should save money but not affect the end user. For example, the Ekta day centre which offers day care for older people from the Asian community will be outsourced but continue to be run by the new service providers. Although there were some concerns arising from the corporate budget consultation regarding the potential quality of service provided by contractors, work will be monitored to ensure that quality is maintained.

Due to reduced funding, inevitably some day care centres will close. However, some provision will remain and these will be expected to work more efficiently, encouraging full occupancy rates. Additionally, these day care services will be spread more evenly across the city, providing more equal access and offering an opportunity to improve service. In this reduced but more equally spread provision the net loss to users and potential users is mitigated as far as is possible with available resources.

Two community centres, Heath Town and St Chad's, will close. However, this will be mitigated by signposting groups to alternative locations to utilise. In particular, the lunch club for older people at Heath Town community centre is being given a grant to support their relocation.

Older people may be affected by the reduction in opening hours of libraries, but consultation is underway in an attempt to ensure there is a range of opening hours to provide maximum access. There also may be an at-home library service for older people unable to get to the library. Again these provisions are intended to mitigate the potential for adverse impact here.

Older people will not be affected by the changes to eligibility of the local council tax support scheme, as pensioners are covered by alternative provision.

## 9.2 Children and Young People

Overall, provision for children and young people (CYP) will be reduced. The Youth Service savings proposals have been subject to scrutiny by the Children and Young People Scrutiny Panel, which includes Youth Council members. There will be targeted youth workers based in MASTs across the city who will provide intensive work with the most vulnerable CYP.

Additionally, there is on-going work to enable voluntary groups to transfer community assets and maintain open access youth service provision across the city. A budget of £100,000 is to be made available to support a range of provision including; small grants to local community organisations, some commissioned voluntary sector re-provision on local open-access youth provision in areas of particular need, and some specific pieces of targeted needs led work including support for local youth democracy.

By drawing upon community and voluntary groups such as faith groups, open access may be maintained under a different guise. However, the reduction in discretionary rate relief may dis-incentivise community groups to provide services as it will be more costly to rent premises. The corporate budget consultation showed concerns that this may cause some charitable groups to disband, but there is on-going consultation and work to mitigate this potential outcome.

The reduction in the early intervention service will specifically impact two groups: *X2Y Group* which provides support to Lesbian, Gay, Bisexual, Transgender and Questioning young people, and *Base 25 Young Dads and Lads*. However this proposal has allowed time to transition these groups to other funding streams which should mitigate the impact. Also, mainstream services, such as those focussing on reducing numbers of looked after children, are now placing more emphasis on an early intervention agenda which may be able to replace some of the work currently performed by these groups.

CYP may be affected by the reduction in leisure subsidies, particularly had Central Baths closed. However, the on-going work to find new funding sources for the baths may prove successful. Also, there is other provision in the city. There will also be a reduction in the number of play areas across the city. These will be replaced by a fewer, but higher quality, play areas. Dilapidated play areas will be closed, but only when there is alternative nearby provision. Additionally the new “map” of play provision has a better spread across the city so that the negative impact of fewer area is mitigated by this better spread of higher quality areas. A full equalities analysis and consultation of this proposal is still on-going.

## 9.3 Sexual Orientation

X2Y group, which provides support to Lesbian, Gay, Bisexual, Transgender and Questioning young people, will have its funding ceased. However, there is sufficient time to enable signposting to other funding streams to take place.

During the consultation process for the changing of local council tax support scheme, LGBT groups raised concerns that LGBT people may be disproportionately affected by

changes in single person supplements, as they claim that 60% of LGBT Wulfranians live alone.

#### **9.4 Disabled people**

Similarly to older people, the savings proposals regarding people with mental health impairments will encourage independent living wherever possible. Users who are able enough to live alone will be relocated from full time nursing to independent living facilities. This may be seen by some users as a very positive step, fostering new found autonomy. Others may need increased support to make the transition successfully, which will be offered at every stage. Each decision will be made on a case by case basis, with extensive consultation with the user in question. As consultation is still on-going and there is not extensive monitoring information available, these changes will continue to be monitored and only implemented if compliant with PSED requirements.

Disabled children will be affected by a reduction in the early intervention grant, particularly in regards to short break provision. Some groups may have to cease functioning, but many will maintain some residual funding or will be signposted to find funding from elsewhere.

Disabled people may be particularly affected by the reduction in opening hours of libraries, but consultation is underway in an attempt to ensure there is a range of opening hours to provide maximum access. There also may be an at-home library service for people unable to get to the library.

There was concern voiced during consultation that the change in local council tax support would disproportionately affect disabled people. Although inevitably these cuts will impact upon disabled people, the new scheme will continue to disregard Disabled Living Allowance and Personal Independence Payments as income, and includes a Discretionary Discount Policy to help those in crisis.

The reduction in the voluntary community sector grant means that some groups who serve disabled people will have their VCS grant funding ended. The impact of this has been mitigated by the use of invest to save grants, equity and diversity grants, signposting to alternative funding streams and where possible funding some groups for an additional 12 months to allow time to find alternative income.

#### **9.5 Race**

As previously mentioned, some race specific day care groups will be affected by the savings proposals. However, groups such as Ekta day centre will be maintained but run by an external provider at a lower cost. Therefore, there should be minimal impact on the end service user.

The Tell Us Once service is being ceased but outreach work for groups such as Romany families are already provided through an alternative service, the Education Travellers Service. Other ways of providing support for children who do not apply for school places are being explored as part of the wider Early Help services available.

## **9.6 Gender**

Women may be disproportionately impacted by some savings proposals. The revision of the local council tax support scheme will impact single parent households, 90% of which are headed by a woman in Wolverhampton. The proposal would mean that Child Benefit would be taken into account as income for the second and subsequent child, which would mean mothers with multiple children would have to contribute more towards their council tax. However, the Discretionary Discount Policy would be available to single parents in times of real need.

During corporate budget consultation, there were concerns raised regarding female use of Central Baths, with women's groups claiming that Asian women in particular often use Central Baths. Closing this service may impact upon them should alternative revenue streams to maintain the Baths not be found.

## **10.0 Re-invigorating the City**

There are a number of savings proposals relating to 'Re-invigorating the City' which did not require a full analysis as they would not disproportionately impact upon equality groups. Most are related to restructures, removal of vacant posts and rationalisations of services. Generally the end user will not be affected as work load will be absorbed by remaining resources e.g. gritting fleet.

There will be some reductions in services but these will not create a disproportionate impact, such as: reduction in highway surfacing, reduction in street lighting maintenance and reduction in sign de-illumination programme. Others may affect the aesthetics of the city but will not affect equality groups more, such as the reduction in bedding plants and ground maintenance reviews.

The impact of savings proposals which required a full analysis are detailed below.

### **10.1 Older people**

Older people and disabled people may be affected by two key savings proposals: Shopmobility and the review of public toilet provision. There is on-going work to find a partner to take over the running of Shopmobility, which enables the immobile to access the shops in the city centre. This is not a statutory function. If a partner was not found and Shopmobility had to close, there would be another equality analysis conducted to understand the impact of its curtailment. However, this saving will not be realised until 2017 so there should be sufficient time to secure alternative provision. Usage data is currently being collated to inform the prospective transfer of service in 2017.

The review of public toilets provision may also affect the older population and disabled people if toilets were to close, as they are more likely to have conditions which necessitate frequent access to facilities. Remaining toilets would also have to have sufficient disabled access. A full equalities analysis has begun in order to understand the true extent of the impact of this proposal.

During the corporate budget consultation, concerns were raised regarding the reduction of neighbourhood wardens. It was claimed that their presence reassured the elderly and vulnerable in their communities. The consultation for this proposal is still on-going and the outcome should help to show how to mitigate any adverse impacts.

## **10.2 Disabled people**

Disabled people will be affected by the same proposals, and in the same way, as the effect on older people described above.

## **10.3 Gender**

Women may face a disproportionate impact if public toilets were to close during the review, due to pregnancy, or their tendency to care for young children. The community safety team also offers services to vulnerable women such as those suffering domestic violence. This work focusses on outreach and preventative action, and funding will cease in 2017. However, most of the work is done in partnership and there is on-going work to encourage partners to maintain the current level of provision.

## **10.4 Confident Capable Council**

Most of the savings proposals that fall under the 'Confident Capable Council' priority did not need a full equality analysis and were only subject to an initial screening. These proposals will not affect certain groups of staff or service users disproportionately.

Many of the proposals relate to restructures and the removal of vacant posts, including within business support teams and management. Although these proposals will affect employees, they will not affect service users and precautions will be taken by Human Resources to ensure there is no disproportionate employment impact. Some proposals will affect employees but not disproportionately, such as a reduction in training funding, minimising trade union costs and a reduced insurance scheme. Some savings come as a result of a scaling back of overall council business, such as a reduction in number of phone lines, ceasing warranty extension on computers and a reduction of numbers of Property services employees and a cut in the budget for the carbon reduction scheme due to a reduced property portfolio. Other proposals focus on making efficiencies and renegotiating existing contracts to save money without a significant negative impact.

Other proposals are concerned specifically with councillors, such as the reduction in number, reduced allowances and a review of the function of the Mayoral office.

Some services will affect end users but should not create a disproportionate impact on equality groups. These include: the reduction of lunchtime crossing patrols, changes in domestic waste collection, reduction in bereavement services, reduced cleaning provision and a review of highway maintenance services.

Most of the savings proposals grouped under Confident, Capable Council impact upon employees of Wolverhampton City Council. Employment law will be adhered to in the implementation of these savings proposals. Equalities monitoring of applicants to the

Voluntary Redundancy scheme is in place, alongside wider workforce equalities monitoring which is published every January. The impact of savings proposals which required a full analysis are detailed below.

### **10.5 Gender and Race**

Some proposals may have a disproportionate impact on certain groups. These include the proposal to transfer employees to a five in seven day contract, which would require staff to work at weekends when necessary. Care services would present the primary weekend need, and the over-representation of women and BME in this sector may mean they are disproportionately affected. There will be a full equalities analysis conducted to understand the impact.

### **10.6 Disabled Employees**

Employees on long term sick leave will no longer be able to accrue annual leave whilst away from work, and will instead only accrue statutory leave. This will inevitably impact those suffering from long term health issues, which is classified as a disability. There will be a full equalities analysis conducted to understand the full impact and mitigations. A reduction in the number of work station assessments may also impact disabled employees, as those with disabilities or health conditions are able to request reasonable adjustments.