

## **Communities Committee budget proposals 2018-2019**

# **Equality and rural assessments – findings and recommendations**

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**This assessment helps you to consider the impact of service changes on people with protected characteristics and in rural areas. The assessment can be updated at any time to inform service planning and commissioning.**

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## The purpose of equality and rural assessments

1. The purpose of equality and rural assessments is to enable elected members to consider the potential impact of decisions on different people and communities prior to decisions being taken. Mitigating actions can be developed if detrimental impact is identified.
2. It is not always possible to adopt the course of action that will best promote the needs of people with protected characteristics or people in rural areas. However, assessments enable informed decisions to be made, that take into account every opportunity to minimise disadvantage.

## The Legal context

3. Public authorities have a duty under the Equality Act 2010 to consider the implications of proposals on people with protected characteristics. The Act states that public bodies must pay due regard to the need to:
  - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act<sup>1</sup>;
  - Advance equality of opportunity between people who share a relevant protected characteristic<sup>2</sup> and people who do not share it<sup>3</sup>;
  - Foster good relations between people who share a relevant protected characteristic and people who do not share it<sup>4</sup>.
4. The full Act is available [here](#).

## The assessment process

5. This assessment comprises three phases:
  - **Phase 1** – evidence is gathered on the proposal, to examine who might be affected and how. This includes reviewing the findings of related assessments and public consultation, contextual information about local populations and other relevant data. Where appropriate, public consultation takes place.
  - **Phase 2** – the results are analysed. The assessments are drafted, making sure that any potential impacts are fully assessed. If the evidence indicates that a proposal may have a detrimental impact on people with protected characteristics or in rural communities, mitigating actions are considered.
  - **Phase 3** – the findings are reported to service committees, to enable any impacts to be taken into account before a decision is made.

## Communities budget proposals 2018-2019

6. Communities Committee has put forward 13 budget proposals for 2018-2019:

	<b>Title of proposal</b>	<b>Description</b>
1.	Capitalisation of activities to release a revenue saving	The ICT equipment used by the fire and rescue service is currently leased and the lease is due to expire. Rather than lease new equipment, we will purchase it, which is the approach already taken for the rest of the Council. The purchase of new equipment is a capital cost, which means we can free up our revenue budget for the lease costs as a saving. It will not reduce the amount of equipment that we have. We have separate arrangements in place for our control room, which is not affected by this proposal.
2.	Changing back office processes and efficiency	This relates to the high volume print service in Customer Services. The lease for the high volume printers came to an end during 2017 and new arrangements have been procured. These are cheaper and so we can deliver a saving.
3.	Vacancy management and streamlined management arrangements – museums and historic environment	There are some vacancies in the Culture and Heritage portfolio. Rather than recruit to these, we are looking at how we could change arrangements to enable these posts to be deleted. They relate to the historic environment service where, for example, we are looking at closer working with the museums archaeology service.
4.	Vacancy management – customer services	This relates to the Customer Service Centre - reducing the number of posts by deleting some vacancies. The vacancies have arisen (and will continue to arise) because of efficiencies we have been able to make due to increased digitisation. This will not impact on service standards.
5.	Income generation – Norfolk Museums Service	This saving aligns to the programme/timetable for the Castle Keep development project. In addition, work is underway to identify other ways to increase income generation e.g. through other improvements to the customer offer.
6.	Income generation – Norfolk Records Office	Work is proposed to consider ways to generate income.
7.	Income generation – Norfolk Community Learning Services (NCLS)	The 2019/20 amount is about positioning NCLS so that it is able to support the delivery of apprenticeships, which will be additional funded activity. The 2010/21 amount relates to property exploitation and utilisation e.g. using fewer or cheaper buildings, improving the catering offer.
8.	Income generation – Library and Information Service	We are exploring other ways to generate income for the library service. Some existing income generation streams are already at risk and doing more of the same will not deliver a saving. We need to develop new ways to generate income.
9.	Reduction in Healthwatch grant	Healthwatch is a statutory body that works with health and social care services in Norfolk to make sure that the views and experiences of local people can inform how services are delivered. This particularly includes people from underrepresented groups.

	<b>Title of proposal</b>	<b>Description</b>
		The Healthwatch grant provided by the County Council is above the statutory minimum. This proposal means reducing the Healthwatch grant to the statutory minimum. Note that the statutory minimum amount of funding has been reduced by Government this year, and so there is a real-time reduction for Healthwatch of around £220k.
10.	Using Public Health Grant funding to support the delivery of Public Health activity throughout the Authority	We are currently looking for opportunities throughout the Authority that contribute to delivery of Public Health outcomes.
11.	Norfolk Community Learning Services – remodelling the staff structure, including staffing reduction	This involves a detailed review of the staffing structure for Norfolk Community Learning Services so that resources can be better targeted to delivery of outcomes. It is anticipated that we can reduce overall numbers without any significant impact on service delivery.
12.	Providing a joined up Library and Children's Centre Services	This will seek opportunities to align activity and buildings across Children's Centres and libraries - discussions with Children's Services are underway on this. This is a model already in place in other councils.
13.	Registrars Service – external income	Increase our income by expanding the range and variety of services we charge for

## Who is affected?

7. The proposals will affect residents, visitors and businesses in Norfolk, including people with protected characteristics and in rural areas, and our staff:

<b>People of all ages</b>	<b>YES</b>
<b>Disability</b> (all disabilities and long-term health conditions, including but not limited to people with, for example, reduced mobility; Blind and visually impaired people; Deaf and hearing impaired people; people with mental health issues; people on the Autism spectrum; people with learning difficulties and people with dementia).	<b>YES</b>
<b>Gender reassignment</b> (e.g. people who identify as transgender)	<b>YES</b>
<b>Marriage/civil partnerships</b>	<b>YES</b>
<b>Pregnancy &amp; Maternity</b>	<b>YES</b>
<b>Race</b> (different ethnic groups, including Gypsies and Travellers)	<b>YES</b>
<b>Religion/belief</b> (different faiths, including people with no religion or belief)	<b>YES</b>
<b>Sex</b> (i.e. men/women/intersex)	<b>YES</b>
<b>Sexual orientation</b> (e.g. lesbian, gay and bisexual people)	<b>YES</b>

## Potential impact

8. The proposal to reduce the Healthwatch grant may have a disproportionate and detrimental impact on people with protected characteristics, because Healthwatch particularly works with these groups. More information about this is set out on page 10.
9. The proposal to remodel the staff structure of Norfolk Community Learning Services may have a detrimental impact on some parents of young children aged 0-3 years old. This is because the proposal will see the deletion of 2.166 full time equivalent posts, which currently provide a childcare service for adult learners. More information about this is set out on page 7.
10. The other 11 proposals are unlikely to have a detrimental impact on people with protected characteristics or in rural areas. The reasons for this are provided below:

	<b>Title of proposal</b>	<b>Impact</b>
1.	Capitalisation of activities to release a revenue saving	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
2.	Changing back office processes and efficiency	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
3.	Vacancy management and streamlined management arrangements – museums and historic environment	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because the deletion of these posts will not lead to changes to service standards, quality or delivery. Staff with protected characteristics will not be disproportionately affected compared to other staff.
4.	Vacancy management – customer services	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because any posts affected are already vacant, and the deletion of these posts will not lead to changes to service standards, quality or delivery.  There is a risk that customer waiting times could increase slightly, but calls relating to vulnerable adults and children will continue to be prioritised.
5.	Income generation – Norfolk Museums Service	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
6.	Income generation – Norfolk Records Office	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
7.	Income generation – Norfolk Community	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected

	<b>Title of proposal</b>	<b>Impact</b>
	Learning Services	<p>characteristics or in rural areas. This is because:</p> <ul style="list-style-type: none"> <li>• There is no change to service standards, quality or delivery.</li> <li>• The proposal will create an opportunity to consider whether accessibility of the existing premises for disabled people can be enhanced.</li> </ul>
8.	Income generation – Library and Information Service	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
9.	Using Public Health Grant funding to support the delivery of Public Health activity throughout the Authority	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.
10.	Norfolk Community Learning Services – remodelling the staff structure, including staffing reduction	<p>The proposal to remodel the staff structure of Norfolk Community Learning Services may have a detrimental impact on some parents of very young children, 0-3 years old. This is because the proposal will see the deletion of 2.166 full time equivalent posts, which currently provide a childcare service for adult learners.</p> <p>This should not have a major impact on adult learners with children over three years of age, because these learners will be able to access free provision in the immediate area (all three to four year olds in Norfolk can get free early education or childcare – as well as some two year olds).</p> <p>However, learners with children under three will not have the same entitlement. However, where courses include skills and qualifications such as functional skills, learners will be able to access Discretionary Learner Support Funding to pay for childcare. There is also the option that when learning takes place at locations such as children's centres, the centre will be asked to contribute in kind to the provision of childcare.</p> <p>The Council's customer services staff will be able to advise learners of their entitlement to free childcare provision and where it can be accessed in Norfolk.</p> <p>It is possible that the greatest impact may be on parents of 0-3 year olds in rural areas, as they may have the least access to alternative provision, and have to travel further to find a suitable replacement. Some of these parents may not be able to find a suitable alternative, or may not be able to afford it.</p> <p>It should be noted that a survey of other local authorities has shown that few local authorities provide childcare</p>

	<b>Title of proposal</b>	<b>Impact</b>
		<p>(crèche or similar) facilities, for financial reasons, and NCLS is one of the last remaining providers to do so.</p> <p>Other than the issues highlighted above, the deletion of these posts will not lead to changes to service standards, quality or delivery. It could improve service quality, by creating a more efficient model.</p> <p>There is no reason to expect that staff with protected characteristics would be disproportionately represented in any redundancy or redeployment figures. Current HR monitoring data confirms that the profile of redundancies remains in line with the overall workforce profile of the organisation.</p>
11.	Providing a joined up Library and Children's Centre Services	<p>There is no evidence to indicate that this proposal would have any significant detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.</p> <p>One possible issue to take into account however is that if operations in rural centres are closed and consolidated into market towns, this may transfer the cost for travel etc. onto the user. This also assumes that users have the 'technical' ability to travel to access a site i.e. people have a car or access to a bus route. This may not always be the case for people in rural areas, particularly disabled or older people. This could have an unintended consequence of preventing people accessing services. To address this, it will be important to fully risk assess access planning of potential sites, and conduct cost impact assessments on users.</p> <p>Another issue to take into account is that the proposal mentions that people will be able to access more services 'on-line'. It will be important to take into account that many people in rural areas do not have good broadband access, may not be ICT literate or may require a minimum level of web accessibility in order to access ICT (e.g. for disabled users). Also, people on low incomes may lack the necessary hardware and software at home to connect to online services. This issue of digital inclusion is being considered by the Council's new Digital Innovations Committee.</p> <p>The proposal may result in children's centre and library services being provided in the same or community buildings. Any options to relocate services to different buildings, or to share buildings between libraries and children's centres would need to take into account the accessibility of these buildings for disabled people, and access to public transport and disabled parking. Where there may be greater constraints on space, it will be</p>



	<b>Title of proposal</b>	<b>Impact</b>
		<p>important to ensure that there is still sufficient space for disabled children, adults and staff to easily access all areas (for instance, when using motorised wheelchairs), and appropriate accessible toilet/changing facilities. It will also be important to ensure that consideration is given to managing noise levels – to address the needs of people who are hearing impaired or deaf.</p> <p>Looking ahead, the proposal to locate children centres and libraries into one location is likely to have a positive impact on community cohesion, and could present long term opportunities to promote equality. For example, Norfolk libraries are highly regarded by diverse communities, and have a great deal of expertise in promoting accessibility and inclusion. Children's centre staff have expertise in specialised areas, such as being ambitious for disabled young people to help them develop their full potential. Locating both teams in one building will create opportunities for pooling this wealth of ideas, knowledge and expertise, to benefit all communities.</p> <p>It is possible to confirm that overall, there are now more front-line staff in libraries available to assist service users than in 2016/2017.</p> <p>It should be noted that last year, Communities Committee requested that an additional equality impact assessment be carried out on the budget proposal relating to Library services, to ensure that every possible opportunity was being taken to minimise impact on service users. This assessment did not identify any new issues that had not previously been considered.</p>
12.	Registrars Service – external income	There is no evidence to indicate that this proposal would have any detrimental impact on people with protected characteristics or in rural areas. This is because there is no change to service standards, quality or delivery.

<b>Title of proposal:</b>	<b>Reduction in Healthwatch grant</b>
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## **Potential impact**

11. There is evidence that the proposal to reduce the Healthwatch Grant could have a disproportionate and detrimental impact on people with protected characteristics.
12. This is because the Healthwatch grant is used to fund work to make sure that the views and experiences of local people can inform how health and social care services are delivered. This particularly includes people from underrepresented groups – such as Black, Asian and minority ethnic people, migrant workers, people with mental health issues, people on the Autism spectrum, people with other disabilities, older people, and people with long term health conditions such as cardiovascular disease - many of whom live in rural areas.
13. It should be noted that underrepresented groups in health and social care may be particularly vulnerable to marginalisation because of the nuanced characteristics surrounding their circumstances. For example, Healthwatch would/could be advocating for a group of young women with breast cancer who are trying to look after their families with little support provided in terms of appropriateness of appointment times, childcare arrangements, access etc. Similarly, as is currently the case, Healthwatch is working with a range of families who have children with very special needs in relation to the autistic spectrum.
14. This highly nuanced work by Healthwatch regularly leads to improvements in social and healthcare services for people with protected characteristics. For example, recommendations in Healthwatch's Looked After Children Report led to changes in service delivery and commissioning at a national, regional and local level. There is a clear risk that this would be lost if the proposal goes ahead.
15. If the proposal goes ahead, Healthwatch's capacity to undertake this work will be significantly reduced. This means it will have less resources to engage with people from these groups. It will still be able to work with these groups, but not to the extent that it currently does. In particular, Healthwatch would no longer be able to be represented on a range of different bodies or attend meetings.
16. To mitigate this impact, the Council could offer assistance to Healthwatch to help determine how best to continue to engage with underrepresented groups to ensure that their views inform health and social care services, in line with reduced funding. Where possible, the Council will also highlight alternative sources of funding or opportunities that may be available to Healthwatch.

## **Accessibility considerations**

17. Accessibility is a priority for Norfolk County Council. Norfolk has a higher than average number of disabled and older residents compared to other areas of the UK, and a growing number of disabled young people.
18. Proposals relating to business process re-engineering will take full opportunity to build accessibility considerations into service planning and design.

19. Proposals relating to contract review will also take full opportunity to build accessibility considerations into service design.

## Human rights implications

20. Public authorities in the UK are required to act compatibly with the Human Rights Act 1998. There are no human rights issues arising from the proposals.

## Recommended actions

	Action	Lead	Date
1.	If the proposal to reduce Healthwatch grant goes ahead, offer assistance to Healthwatch to help prioritise activity in line with the areas of highest need for people with protected characteristics, and highlight alternative sources of funding or opportunities that may be available to Healthwatch.	Assistant Director, Community, Information and Learning	From 1 April 2018
2.	If the proposal to remodel the staff structure of Norfolk Community Learning Services goes ahead, support learners who currently use the childcare service to access alternative provision, including ensuring staff are trained to be able to inform them of their entitlement to alternatives.	Assistant Director, Community, Information and Learning	From 1 April 2018
3.	If the proposal to provide a joined up Library and Children's Centre service goes ahead, at an appropriate stage when the review has taken place, equality/rural impact assessments to be carried out, to identify any potential impacts on service users. This to include a risk assessment of access planning of potential sites, and a cost impact assessment on users.  If any detrimental impacts are identified, they should be reported to Children's Services/Communities Committee as appropriate, along with any proposed mitigating actions that could be carried out, for consideration before a final decision is made.	Acting Assistant Director (Early Help and Prevention)	From 1 April 2018
4.	HR Shared Service to continue to monitor whether staff with protected characteristics are disproportionately represented in redundancy or redeployment figures, and if so, take appropriate action.	Senior HR Consultant (Workforce Insight)	From 1 April 2018

## Evidence used to inform this assessment

- Norfolk budget proposals 2018/19 – consultation documents and background papers: <https://norfolk.citizenspace.com/consultation/budget2018/>
- Equality Act 2010
- Public Sector Equality Duty

- Business intelligence and management data, as quoted in this report.
- Relevant service specific Codes of Practice and national guidance

## Further information

For further information about this equality impact assessment please contact Jo Richardson, Equality & Diversity Manager, Email [jo.richardson@norfolk.gov.uk](mailto:jo.richardson@norfolk.gov.uk)



If you need this document in large print, audio, Braille, alternative format or in a different language please contact Jo Richardson on 0344 800 8020.

### <sup>1</sup> Prohibited conduct:

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

Indirect discrimination occurs when a condition, rule, policy or practice in your organisation that applies to everyone disadvantages people who share a protected characteristic.

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”.

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

### 2 The protected characteristics are:

**Age** – e.g. a person belonging to a particular age or a range of ages (for example 18 to 30 year olds).

**Disability** - a person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Gender reassignment** - the process of transitioning from one gender to another.

**Marriage and civil partnership**

**Pregnancy and maternity**

**Race** - refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion and belief** - has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism).

**Sex** - a man or a woman.

**Sexual orientation** - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

### 3 The Act specifies that having due regard to the need to advance equality of opportunity might mean:

- 
- Removing or minimizing disadvantages suffered by people who share a relevant protected characteristic that are connected to that characteristic;
  - Taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of others;
  - Encouraging people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such people is disproportionately low.

4 Having due regard to the need to foster good relations between people and communities involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.