

Equality Impact and Needs Analysis Guidance and Template : 2021

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports.

Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Budget challenge – 115 Efficiencies in delivery of Healthy Adults health promotion and outreach services.			
Equality analysis author		Rebecca Harkes, Head of Programme for Long Term Conditions and Health Inclusion Arrthi Pangayatselvan Consultant in Public Health			
Strategic Director:		David Quirke-Thornton, Strategic Director of Children and Adults Services			
Department		Children and Adults	Division	Public Health	
Period analysis undertaken		December 2023			
Date of review (if applicable)					
Sign-off		Position		Date	

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

A review of the Public Health Team's outreach and health promotion activity has identified efficiencies arising from backroom functions and contracting arrangements. Action taken over previous years has enabled efficiencies to be amalgamated which now allow for the development of an outreach service for inclusion health groups in Southwark and to contribute funding to supported housing.

The aim of the proposed outreach work is to co-ordinate an outreach offer to better meet the needs of vulnerable groups, focusing on inclusion health groups. 'Inclusion health groups' refer to people who are often socially excluded and experience multiple and overlapping risk factors for poor health. For example, these may include people who are homeless, people who have contact with the criminal justice system, sex workers, vulnerable migrants, people with learning disabilities, Gypsy, Roma and Traveller communities and other groups who experience multiple overlapping health needs. People belonging to inclusion health groups tend to have poor health outcomes, which are often much worse than the general population. Those within inclusion health groups can often experience structural barriers to maintaining good health and accessing health and care services. This contributes considerably to increasing health inequalities across our communities.

A newly developed offer will aim to better support several vulnerable and inclusion health groups. This aims to decrease barriers for these groups to seek and obtain support for their health and wellbeing needs. The service proposed will not replace existing health and care services, but will work with them to improve service access, outcomes and experiences for groups where additional support is required. The impact of the service is expected to be a positive one, as it aims to better support the needs of particularly vulnerable groups.

Funding will also be provided to supported housing which, through addressing the wider determinants of health, can consequently improve the health of vulnerable groups.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	<p>To shape the development of this outreach service, engagement will take place with the following groups:</p> <ul style="list-style-type: none">- People experiencing homelessness (including those living in temporary accommodation and those sleeping on the streets)- People who sell sex- People seeking asylum, refugees and vulnerable migrants- Gypsies, Roma and Travellers- People with learning disabilities- People in contact with the justice system- People with substance use disorders. <p>Work is being planned to reach out to those groups in Southwark, via peer research models where possible, to ensure their priorities for their health and care are built into the service.</p>
Key stakeholders were/are involved in this policy/decision/business plan	<p>Key stakeholders that will shape this service include:</p> <ul style="list-style-type: none">- South East London Integrated Care Board (ICB)- Voluntary and community sector providers including faith groups- Southwark's Find and Treat Team- Southwark's Health Inclusion Team- Southwark Council colleagues (including the Homelessness Team, No Recourse to Public Funds Team, Adult Social Care Team).

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and

	negative)
<p><u>Positive</u> The development of an outreach service is expected to have a positive benefit across all age groups.</p> <p>The service will predominantly be targeted at adults, by virtue of the demographics of many inclusion health groups. People belonging to inclusion health groups can often have lower life expectancy than the general population and thus, services may not have historically accounted for the needs of these groups as they grow older. Any service will be commissioned to have due regard to people's varying needs across their lifespan, particularly ensuring that needs commonly associated with ageing are not overshadowed.</p> <p><u>Negative</u> There are no expected negative impacts based on age.</p>	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on age.</p>
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
<p>The needs of inclusion health groups in Southwark are understood through the following analysis work:</p> <ul style="list-style-type: none"> - Southwark's Joint Strategic Needs Assessment Annual Report 2023, available here: https://www.southwark.gov.uk/assets/attach/206524/J_SNA-Annual-Report-2023.pdf - Rough sleepers JSNA, available here: https://www.southwark.gov.uk/assets/attach/8443/Rough-Sleeper-JSNA.pdf - People with learning disabilities JSNA, available here: https://www.southwark.gov.uk/assets/attach/8359/JSNA-2018-Learning-Disabilities.pdf - Asylum Seeker and Refugee JSNA, available here: https://www.southwark.gov.uk/assets/attach/230579/The-Southwark-Asylum-Seeker-and-Refugee-JSNA-June-2023.pdf <p>Gaps in data is a common challenge in understanding the needs of inclusion health groups. Health needs can be unclear if an inclusion health group is 'invisible' in a dataset due to inconsistent recording or systems not designed to capture their specific needs as a group. To mitigate this, engagement will take place with inclusion health groups to capture further insight into their health and wellbeing priorities, ensuring these priorities shape service design.</p>	See equality information.
Mitigating and/or improvement actions to be taken	
N/a	

Disability - A person has a disability if s/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.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
<p><u>Positive</u> The development of an outreach service is expected to have a positive impact for disabled people in Southwark.</p> <p>Disabled people are over-represented in some inclusion health groups to whom the service will provide targeted support (for example, people experiencing homelessness). The service will also provide targeted support to people with learning disabilities. Through this targeted approach, the service will work to reduce barriers to good health for these groups.</p> <p>The needs of individuals that the service works with will vary. The service will be commissioned and monitored to ensure that it is accessible to all and supports other services to make reasonable adjustments where required.</p> <p><u>Negative</u> There are no expected negative impacts based on disability.</p>	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on disability.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>As above (Equality information – age), in particular:</p> <ul style="list-style-type: none">- People with learning disabilities JSNA, available here: https://www.southwark.gov.uk/assets/attach/8359/JSNA-2018-Learning-Disabilities.pdf	<p>As above (Equality information – age).</p>
Mitigating and/or improvement actions to be taken	
N/a	

Gender reassignment:

- The process of transitioning from one gender to another.

Gender Identity: Gender identity is the personal sense of one's own gender. Gender

identity can correlate with a person's assigned sex or can differ from it.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
There are no expected impacts (positive or negative) of the development of the outreach service on residents based on gender reassignment.	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on gender reassignment.</p>
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
As above (Equality information – age).	As above (Equality information – age).
Mitigating and/or improvement actions to be taken	
N/a	

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
There are no expected impacts (positive or negative) of the development of the outreach service on residents based on marriage or civil partnership.	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health</p>

	<p>inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on marriage and civil partnership.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
As above (Equality information – age).	As above (Equality information – age).
Mitigating or improvement actions to be taken	
N/a	

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>There are no expected impacts (positive or negative) of the development of the outreach service on residents based on pregnancy and maternity.</p>	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on pregnancy and maternity.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
As above (Equality information – age).	As above (Equality information – age).

Mitigating and/or improvement actions to be taken	
N/a	

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<u>Positive</u> The service will aim to provide support to Gypsy, Roma, and Traveller communities, who report poorer health than the general population. This targeted approach aims to reduce health inequalities and reduce barriers to care for this group. <u>Negative</u> There are no expected impacts of the development of the outreach service on residents based on race.	<u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities. <u>Negative</u> There are no expected negative impacts based on race.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
As above (Equality information – age). Gypsy or Irish Traveller Populations, England and Wales, Census 2021, available here: Gypsy or Irish Traveller populations, England and Wales - Office for National Statistics	As above (Equality information – age).
Mitigating and/or improvement actions to be taken	
N/a	

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>There are no expected impacts (positive or negative) of the development of the outreach service on residents based on religion or belief.</p>	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p> <p><u>Negative</u> There are no expected negative impacts based on religion and belief.</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>As above (Equality information – age).</p>	<p>As above (Equality information – age).</p>
Mitigating and/or improvement actions to be taken	
<p>N/a</p>	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>There are no expected impacts (positive or negative) of the development of the outreach service on residents based on sex.</p>	<p><u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities.</p>

	<u>Negative</u> There are no expected negative impacts based on sex.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
As above (Equality information – age).	As above (Equality information – age).
Mitigating and/or improvement actions to be taken	
N/a	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
There are no expected impacts (positive or negative) of the development of the outreach service on residents based on sexual orientation.	<u>Positive</u> Many people within inclusion health groups are impacted by deprivation and have health needs related to socio-economic disadvantage. The service will be targeted towards inclusion health groups and therefore should help to meet these needs and reduce health inequalities. <u>Negative</u> There are no expected negative impacts based on sexual orientation.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
As above (Equality information – age).	As above (Equality information – age).
Mitigating and/or improvement actions to be taken	

N/a

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

Inclusion health groups can experience stigma and discrimination in health and care services which can often be a barrier to maintaining good health. The aim of the outreach service is to decrease barriers to services and improving access, outcomes, and experiences for health inclusion groups. The service will have a key role in promoting the rights of inclusion groups in service access, in particular the Freedom from Discrimination.

Information on which above analysis is based

N/a

Mitigating and/or improvement actions to be taken

N/a

Conclusions

Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:

This service aims to support inclusion health groups, which is expected to have a positive impact on groups with protected characteristics.

The Equality Impact and Needs Analysis is being completed at an early stage of the development of the service. Further work will take place to engage with people from the relevant communities in Southwark to ensure that they shape the design of the service. Engagement will also take place with key stakeholders that provide outreach, wider health and care services or other regular support to inclusion

health groups. The analysis should be revisited when emerging findings from this engagement work are available.

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
No further actions identified.			

5. Equality and socio-economic objectives (for business plans)				
Based on the initial analysis above, please detail any of the equality objectives outlined above that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
No further actions identified.				

6. Review of implementation of the equality objectives and actions	
Engagement work with inclusion health groups will shape the service and may identify further actions required to promote equality and tackle inequalities. This equality impact and needs analysis should be revisited when emerging findings from the engagement work are available (suggested above as June 2024).	

Implementation Equality Impact and Needs Analysis