

Policy and Resources Strategy Budget Equality Analysis Report 2024/2025

Contents

- 1. Purpose of document and Budget Equality Analysis Process 2024-2025**
- 2. Background and Context**
- 3. Budget Equality Analysis Process 2024-2025 and decision making stages**
- 4. On-going monitoring for equality impact**
- 5. Southwark Equality Framework and EINA (Equality Impact and Needs Analysis)**
- 6. Table: Summary of high and medium impact budget proposals and key findings from equality analysis undertaken**
- 7. Summary of key areas and key findings**

1. Purpose of document and the Budget Equality Analysis Process 2024-2025

1.1 The report sets out a cross council overview of the equality analysis of the 2024/2025 budget proposals. The Budget Equality Analysis report should be read in the context of the main overall Policy and Resources Budget strategy report for 2024-25. The Policy and Resources Budget report also has several appendices, including a summary table which sets out all the costs for each budget proposal. This year the Council is setting a three year budget, 2024-25 to 2026-27. Hence the importance of on-going monitoring for equality impact, as budget proposals are further developed during the three year period.

Equality Impact and Needs Analysis (EINA) is an on-going process and will be further built upon as proposals are further developed, consulted upon and implemented. It is a dynamic and pro-active process, which is part of the overall Equality, Diversity and Inclusion (EDI) work in the Council. It is not a paper exercise, but an active part of the way in which the Council builds EDI in all that is relevant to the day to day business and practices it undertakes. As such it is an integral part of the implementation of the Council's EDI policy commitments as outlined in the Southwark Equality Framework (Cabinet, July 2021).

EINAs are service improvement tools, which help us to promote equality, equal opportunity and good community relations, provide appropriate services, as well as helping to ensure we do not unlawfully discriminate or further disadvantage vulnerable and marginalised groups.

1.2 The Public Sector Equality Duty (PESD) does not prevent the Council from making difficult decisions such as reorganisations and relocations, redundancies, and service reductions, nor does it stop the Council from making decisions which may affect one group more than another group.

The equality duty enables the Council to demonstrate that we are making financial decisions in a fair, transparent and accountable way, considering the needs and the rights of different members of local communities. This is achieved through assessing the impact that our policies, procedures and practices could have on the needs of people with different protected characteristics, as understood in relation to the three parts of the duty (see background and context below).

EINAs enable us to ensure we make decisions based on robust evidence and to consider what mitigating actions we could put in place to prevent further disadvantage to vulnerable and marginalised groups in the budget decision making process. EINAs must also be made publically available in line with PSED commitments to publish information; transparency and accountability.

1.3 Departmental teams undertook initial assessments of developing budget proposals and then were asked to undertake a full equality analysis of all areas identified as of medium or high relevance to equality. The aim was for equality analysis undertaken of the developing budget proposals to inform the budget process at all stages of the budget challenge and decision making stages from September/October 2023 onwards.

Budget proposals were divided into 4 areas for the purpose of the budget equality analysis process:

- Savings/Efficiencies in service areas identified as of medium or high relevance to equality
- Savings/Efficiencies identified as of medium or high relevance to equality with mainly staffing implications; these will be undertaken separately and made available in accordance with data protection guidelines.
- Savings/Efficiencies identified as of medium or high relevance to equality which are part of a proposed redesign and review of services/functions; a full equality analysis will be undertaken in these areas as part of the redesign and review of these service areas. These will be monitored by the EDI team and made publically available.
- Commitments, where a full equality analysis will be undertaken as part of further development and implementation of these areas.
- It is also important to note that a report will be produced after 12 months, which will incorporate findings from on-going monitoring of the Budget proposal EINAs for 2024-25.

This budget equality analysis report will also be subject to review and revision with input from key stakeholders. It will be reported to the council's Overview and Scrutiny Committee as part of the scrutiny of the 2024/2025 budget and further considered by Cabinet and Council Assembly in February alongside the budget report. *The independent Equality and Human Rights Panel (EHRP) who provide critical friend scrutiny on equality issues will also discuss it at their meeting. Feedback will be incorporated into the final report presented to Cabinet and Council Assembly.

**(Equalities and Human Rights – FEHRS – Citizens Advice Southwark: <https://www.citizensadviceSouthwark.org.uk/projects-and-services/fehrrs/>) Please see attached link for further information about the Forum for Equality and Human Rights (FEHRS) and the sub group (EHRP), Equality and Human Rights Panel.*

2. Background and Context

The PSED (the Equality Duty) 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 underrepresented groups; ensuring that people with disabilities are not disadvantaged in comparison to people without disabilities.
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED and the council's vision of creating a more equal Southwark is now reinforced in the two additional council values: that we will:

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

2.1 Although not currently covered in law, the Council has also committed to consider socio-economic disadvantage and related Inequalities, alongside needs of different protected characteristics, as part of the commitment to implement the Socio-Economic Duty. The most deprived areas of the borough, for example, have the highest percentages of residents from Black, Asian and Multi-Ethnic backgrounds. The Socio-Economic Duty is a strategic duty and is also incorporated into the work of the development of the Borough Plan (e.g. Closing the Gap) and work to address health inequalities and the cost of living crisis.

2.2 The PSED (the Equality Duty) requires public bodies to consider the potential consequences of decisions for meeting the needs of people who share protected characteristics and to take these into account before a decision is finalised. The report also recognises that the duty is a proactive, on-going and positive one that requires us to advance equality of opportunity and foster good relations between people in all that we do.

The protected characteristics covered by the Equality Duty are:

- age;
- disability;
- gender reassignment; (we also include gender identity)
- marriage and civil partnership (but only in respect of eliminating unlawful discrimination);
- pregnancy and maternity;
- race – this includes ethnic or national origins, colour or nationality;
- religion or belief
- sex;
- sexual orientation

The PSED requires equalities considerations to be factored into policy-making and key decisions about budgets, functions and services, as an integral part of business planning and management rather than an add-on or silo activity.

3. Budget Equality Analysis Process and decision making

- 3.1** The PSED (the Equality Duty) requires public bodies to ensure that the process they follow to assess the impact on equality of budget proposals is robust, and the impact that budget proposals could have on people with protected characteristics is thoroughly considered **before** any decisions are arrived at.

Assessments of the impact on equality must be carried out at a **formative stage** so that the assessment is an integral part of the development of a proposed policy, not a later justification of a policy that has already been adopted. Budget proposals which are relevant to equality, such as those likely to impact on equality in the workforce and/or for local communities, should always be subject to a thorough assessment. This includes proposals to outsource or procure any of the functions of the Council. The assessment should form part of the proposal, and it should be considered carefully **before** making the decision.

- 3.2** An adequate and full equality analysis will enable a decision maker to consider fully the proposed proposal and its likely impact on equality for local communities and staff.

It is also important to remember that the potential impact is not just about numbers. Evidence of a serious impact on a small number of individuals is just as important as something that will impact on many people.

The assessment of impact on equality should be informed by up-to-date and reliable information about the different protected groups that the proposal is likely to have an impact on. A lack of information is not a sufficient reason to conclude that there is no impact. Engagement is also crucial to assessing the impact on equality. All those directly impacted by a proposal must be consulted prior to final decision making. Consultation and engagement information is an important source of information for adequate equality analysis together with local and national demographic and research data. Some have described equality analysis as "consultation in action."

3.3 Cumulative equality analysis can be undertaken periodically over for example a 1-3 or 3-5 year time period to analyse impacts over a period of time for protected characteristics. It can also be undertaken in any one given year where budget proposals presented demonstrate cumulative disproportionate or negative impacts for any protected characteristic. It is also undertaken to ensure that the cumulative impact of separate decisions do not disproportionately impact or disadvantage any protected characteristic and intersectional identities of more than one protected characteristic.

3.4 It is not sufficient to state simply that a policy will impact on everyone equally; there should be a more in-depth consideration of available evidence and information to see if particular protected characteristics are more likely to be affected than others. Equal treatment does not always produce equal outcomes; sometimes authorities will have to take particular steps for certain groups to address an existing disadvantage or to meet differing needs.

3.5 Budget proposal decision making stages:

- Initial consideration of proposal area by departments: summer-autumn period; drafting of proposals and options
- Information, data and consultation/engagement data, crucial from early stages to undertake an equality analysis as part of the drafting of proposals
- An equality analysis can be further built upon throughout the budget proposal process
- Budget challenge process: September-December
- Full equality analysis to be undertaken for all areas assessed and agreed with EDI team as medium or high relevance to equality: September-December

- EDI team to provide critical friend scrutiny and support to departments: September-December
- Cabinet Leads and Cabinet: Budget challenge process: September-December; December-January/February: further decision making stages
- Overview and Scrutiny Committee: January: scrutiny role in the budget decision making process
- Equality and Human Rights Panel: January: external critical friend scrutiny role in the council's EINA process for key areas such as budget proposals
- The commitment we will give to EHRP is that they will be given a minimum of 5 working days to review the Budget Equality Analysis report and Budget proposal EINAs in the future.

3.6 Options in the budget equality analysis process:

- The assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality, address identified gaps and meet diverse needs have been taken in improvement action planning.
- Adjustments to remove barriers identified by the assessment or to better advance equality and meet diverse needs; promote good community relations have been considered where relevant, identified and actions proposed, including any mitigating actions.
- Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact as part of implementation. Considerations will include that on balance the duty to consider due regard has been undertaken together with other business considerations and decisions for example. Expectation is for reasonable and rational decision making and full consideration of mitigating actions where possible.
- The duty to pay due regard to all parts of the PSED as relevant and proportionate is one of adequate and robust consideration of all impacts and needs, as relevant, alongside other Council policy and business considerations, including Borough Plan commitments and EDI commitments for example. A decision maker is required to consider all information and evidence and on balance demonstrate a reasonable and rational decision making process.
- "The decision-maker must give clear consideration to precisely what the equality implications are when balancing the factors to reach a decision, and they must recognise the desirability of achieving the equality objectives (3 parts of the Duty)."

Ultimately, it is for the decision-maker to decide what weight the equality objectives should be given in the light of all relevant factors.

- “If the decision is challenged by judicial review, then provided the court is satisfied that proper and conscientious consideration of the PSED has taken place, the court will not interfere with the decision-maker’s judgment of how much weight should be given to the various factors informing the decision.” (Legal advice from Pinset Masons, 2021)
- However, we are required to **stop and rethink** when an assessment shows actual or potential unlawful discrimination.
- Undertake on-going monitoring for equality impact and review as part of the implementation of decisions and equality action planning and improvements.

4. On-going monitoring for equality impact and implementation of budget proposal decisions.

- The equality duty is an on-going and pro-active duty. It does not end with the production of an EINA. The PSED is a continuing duty, so it cannot be filed away and forgotten after being considered in early decisions on a programme or project. The PSED will need to be revisited and any assessment of the equality implications updated and built upon as necessary if circumstances change, proposals evolve, further feedback or information is received, or there are further stages of decision-making on the programme or project.
- An EINA is an active document and expectation is that it is also further built upon as part of business planning and review, especially when further information, feedback or complaints for example are received. This is particularly important in cases when due to factors such as gaps in information, lack of adequate information or consultation data EINAs have been produced. The expectation is that an EINA is revisited in the context of a complaint, feedback or further information received.
- In the budget proposal decision making process it is important that a full EINA is undertaken or built upon as part of the further development of a proposal and implementation.
- The EDI team will be undertaking on-going monitoring for equality impact of the budget proposal decisions as outlined in 1.1 of this report. This will be in line with the implementation of the Southwark Equality Framework and further strengthening of the EINA process in the Council.
- A further report will be produced for Cabinet Equality Lead after 12 months to understand further development and implementation of proposals and mitigations for protected characteristics, including vulnerable and marginalised groups.
- EHRP (Equality and Human Rights Panel) are also able to ask to see any EINA drafted/produced as part of their external critical friend scrutiny role of the Council’s implementation of the PSED and EDI work.

5. Southwark Equality Framework and Equality Impact and Needs Analysis (EINA)

The EINA process as a whole is integral to the wider Council wide EDI work, including implementation of the PSED and Council commitments to improve services to understand and meet diverse needs of local communities, advance equality of opportunity, and promote equality and good community relations. These are outlined in the Southwark Equality Framework, which was agreed by Cabinet in July 2021.

The Budget proposal decision making process is part of the above and not a stand-alone exercise. The EINA process is integral to business planning and review.

Further work will be undertaken to strengthen the EINA process as part of the implementation and communication of the Southwark Equality Framework and revised EDI Action Plan. This will also include clear linkages to the Borough Plan, Council Delivery Plan and Transformation work, where an EINA process will be built into key Council wide areas and service areas from the start and built upon.

6. Table of summary of EINAs in high and medium impact areas

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Finance	132	Review of corporate contact centre/Exchequer customer services to promote digital first, align performance standards/look at generating economies and consistent approaches to performance management.	Negative	<p>Potential negative impact for Age, Race, and Disability – some residents may be unable to complete online forms and will be signposted to available support.</p> <p>This full EINA will be further built upon to incorporate findings from the consultation and development of the Digital strategy.</p> <p>Council Action Plan (LGA Peer Review) also highlights:</p>

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
				<p>"The digital strategy development will be completed by the end of the spring, and will include expert consultation support to ensure consultation is inclusive and includes people with all needs."</p>
<p>Environment, Neighbourhoods and Growth</p>	<p>302</p>	<p>Review of Noise Nuisance service: implementation postponed until 2025/2026.</p>	<p>Negative</p>	<p>Potential negative impact for Age and for those experiencing socio-economic disadvantage - residents may not have access to SMART devices and internet. Mitigation is to continue with receiving calls/telephone service.</p> <p>Future review will introduce measures to improve access and work with communities to raise awareness.</p> <p>Further data insight by post code and protected characteristics will also be examined.</p> <p>As part of the redesign of the service a full Equality Impact Needs Analysis (EINA) will be carried out.</p>
<p>Finance</p>	<p>149</p>	<p>Merge of Corporate Call centre and Revenues and Benefits Call Centre.</p>	<p>Neutral</p>	<p>No mitigation required. The merging of call centres will have mainly staffing implications (which will be subject to a separate EINA).</p>

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Environment, Neighbourhoods and Growth	316	Remodelling of library service - including introduction of additional services/uses. Will include a reduction in opening hours, informed by usage/demand and may include some self-service and some community management	Negative	<p>Potential negative impact identified for Age, Disability, Race, Pregnancy & Maternity and for those experiencing socio-economic disadvantage.</p> <p>Mitigation put in place includes ensuring that all areas are covered by at least one library that has staffed hours throughout the week to minimise any negative impacts identified.</p> <p>Also ensuring that any sessions for people with disabilities, parents/guardians, toddlers and babies, young or older people, are retained within the new opening times so that there is no loss of provision of activities of this nature.</p>
Environment, Neighbourhoods and Growth	312	Savings associated with running the current Seven Islands Leisure centre, which will close when the new Canada Water leisure centre comes on stream in 2025.	Neutral	No negative impact - no mitigation required.
Environment, Neighbourhoods and Growth	304	Grounds Maintenance contract efficiencies	Neutral	No negative impact - no mitigation required

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Environment, Neighbourhoods and Growth	305	Efficiencies in tree contract and capitalisation of some costs	Neutral	No negative impact - no mitigation required
Environment, Neighbourhoods and Growth	208	Savings from Active Travel (combined savings from implementation of CPZs across the borough and review of Parking Charging Policy)	Possible negative Impact identified after an initial assessment.	EINA to be further built upon as part of the development and implementation of CPZs and review of Parking Charging Policy. On-going monitoring for equality impact.
Environment, Neighbourhoods and Growth	210	Review of PCN charges set by London Councils (Southwark currently issues approx. 190,000).	EINA to be undertaken on completion of the review	This is a London Councils led proposal, the detail of which has yet to be determined. As such, assessment is not possible due to insufficient information being available at this time. Following the receipt of the specific detail of the proposal an appropriate assessment of impact will be undertaken.
Environment, Neighbourhoods and Growth	216	Review of targeted leisure centre programmes, supported by Public Health		A full EINA will be undertaken as part of service review. There will be no immediate impact in 2024/25.

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Environment, Neighbourhoods and Growth	303	Re-organise the Cleaning Service to provide a more efficient management and operational structure, making better use of technology, and enhancing flexible working arrangements for staff.	EINA to be undertaken on completion of the review	A full EINA will be undertaken as part of service re-design.
Environment, Neighbourhoods and Growth	213 & 214	<p>Additional or uplifted charges in parks & leisure centre car parks, and across some other discretionary services – including tennis court hire and youth & adventure play, informed by benchmarking undertaken</p> <p>Additional Income from Increased Fees and Charges in Leisure Services.</p>	Negative	<p>Negative impact identified for Age, Religion and those experiencing socio-economic disadvantage.</p> <p>Mitigation includes: access to free tennis sessions, free junior membership for under 18s for Outdoor activity & Leisure, free pitch space to partner clubs at specific times (after school / school holiday) at Burgess Park Sports Centre to allow free or low cost activity to be run for local children.</p> <p>Funerals & Bereavement a sliding scale of charges that provides a value for money range of affordable services is in place.</p>
Children and Adult's Services	114	Efficiencies in delivery of sexual health service provision.	Positive	The current community contraceptive offer will be reviewed to identify ways to optimise and inform re-commissioning of community contraceptive services to better meet population needs.

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
				No negative impact has been identified, however, there is commitment to ensuring regular monitoring of equalities data relevant to services, to deliver equitable access to appropriate services.
Children and Adult's Services	116	A review of various children and young people Public Health outreach contracts (including 0-19 health visitor and school nursing, weight management, sexual health and substance misuse services) has identified efficiencies arising from backroom functions, contracting arrangements and slow referrals	Positive	Although there is no negative impact, a review of how disabled residents access these programmes, through consultations with relevant stakeholders will be undertaken.
Children and Adult's Services	115	Efficiencies in delivery of Healthy Adults health promotion and outreach services.	Positive	Current health promotion and outreach offers will be reviewed to identify a more co-ordinated approach to health promotion and outreach across public health to support vulnerable groups. No negative impact - no mitigation required
Children and Adult's Services	123	Integration of Early Years support into Family Hubs neighbourhood delivery models.	Positive	Positive impact for families by improving access to support, information and advice in Family Hubs. Full EINA to be produced as part of the development of the service.

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
<p>Children and Adult's Services</p>	<p>101</p>	<p>Efficiencies through promoting greater independence for clients linked to ongoing recovery post discharge through early and regular reviews and interventions such as bed-based reablement, support from occupational therapists, aids and adaptations as well as greater use of universal services and the transitioning of clients into more independent accommodation.</p> <p>Right sizing packages of care following crisis intervention. 6 week post discharge reviews of care by Hospital Social Work Team resulting in reduced care packages linked to ongoing recovery. Bed based Reablement and the use of Home Care Reablement, supporting residents to increase their independence, reducing the need for high levels of care. Double handed to single handed care, through advice and support from Occupational Therapists. Use of aids and adaptations to reduce care packages. Repatriating where possible those on high cost placements back into the borough and transitioning them into more independent accommodation. Greater use of universal services to reduce and support care arrangements. Referral for health funding where appropriate.</p>	<p>Neutral</p>	<p>No negative impact identified. All assessments will take into account specific and diverse needs in accordance with the Care Act 2014 and our responsibilities under the Equality Act 2010.</p> <p>On-going monitoring for equality impact as part of implementation.</p>

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Children and Adult's Services	102	Efficiencies through the maximisation of extra care, night time provision and step down accommodation.	Positive	<p>No negative impact identified. However there is insufficient data on the socio economic position of adults with care and support - the evidence base will be improved.</p> <p>Going forward, the service will also ensure the diverse needs of the local population and service users are considered and are incorporated in commissioning plans.</p>
Children and Adult's Services	219	<p>Planned use of Better Care Fund (approved by Health and Wellbeing Board) against demand pressures and the increased acuity of hospital discharges.</p> <p>The intention is to review and redesign the use of these funds to further create a more streamlined service to resettle patients upon discharge back into the community safely.</p> <p>Better Care Fund provides a stable contribution to Adult Social Care Hospital Discharge Teams and other related services. Additional BCF has been approved.</p>	Neutral	<p>No negative impact identified.</p> <p>There is insufficient data available for those experiencing socio-economic disadvantage. The service will work to influence data capture in the NHS.</p> <p>Service will also work with NHS to ensure continuation of capture of data on race, ethnicity and religion to help inform understanding of diverse needs in the commissioning process.</p> <p>On- going monitoring for equality impact will also be undertaken as part of overall EDI work in Adult Social Care.</p>

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Children and Adult's Services	105 and 203	105:Telecare transformation 203:Introducing a flat two tier fee for (1) the equipment only and (2) equipment and response service in Telecare	Neutral	No negative impact identified. However there is insufficient data on the socio economic position of adults with care and support - the evidence base will be improved.
Children and Adult's Services	201	Telecare - Income Generation from Health related services and digital health provision	Full EINA will be undertaken as part of the development of this service.	Health is developing a Virtual Wards model of supporting people to be monitored and treated outside of hospital. This offers an opportunity for Telecare services in Southwark to link with Health in the development of virtual wards and healthcare delivery to residents.
Children and Adult's Services	108	Reformed service delivery and development of an enhanced pathway to independence for Care Leavers. Reforming practice for older children in care and care leavers to promote the ability to achieve and safely sustain independent living earlier, including increasing the capacity within our contracted support provision.	EINA to be undertaken on completion of the review	Full EINA to be undertaken as part of the review and development of the service. On-going monitoring for equality impact required.

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
Children and Adult's Services	109	<p>Continued reduction of numbers of children in care, and in high cost placements, through ongoing investment in effective services to support children and families.</p> <p>Investment in multiple work streams, strengthening practice and development of effective services, to ensure children in care numbers continue to reduce children, and children in high cost lower quality provision, can be cared for are cared for in less costly better quality provision.</p>	EINA to be undertaken on completion of the review	Full EINA to be undertaken as part of development of service and on-going monitoring for equality impact.
Children and Adult's Services	110	<p>Transformation of Children and Family Centres into Family Hubs, making most efficient and effective use of partnership early help resources and capacity to reduce higher end late intervention for supporting families. This efficiency also takes into account a 21% reduction in the number of 0-4 year olds in recent years.</p> <p>Reviewing Children and Family Centres to reconceived Family Hubs that will involve rationalising the current provision to be more efficient and effective at less cost.</p> <p>Additionally developing the partnership professional system to identify and intervene</p>	EINA to be undertaken on completion of the review	Full EINA to be undertaken as part of the review and development of the service. On-going monitoring required.

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
		earlier to prevent high cost demand and maximise opportunities to create efficiencies through integration of services.		
Children and Adult's Services	301	Undertake review of the Southwark Information and Advice Service (SIAS) team.	Full EINA to be undertaken as part of review of the service.	Full EINA to be undertaken as part of the review and development of the service. On-going monitoring required.
Children and Adult's Services	120	Consolidation of council work relating to information advice and guidance, work placements and post-16 provision.	Full EINA to be undertaken as part of review of the service.	Full EINA to be undertaken as part of the review and development of the service. On-going monitoring required.
Children and Adult's Services	122	Prioritise delivery of Education Psychology Team to delivery of statutory duties and support to the most in need pupils	Negative	<p>Potential negative impact identified for Age, Disability and Race.</p> <p>Investment in mainstream school capacity to support children reducing the need for an EHCP.</p> <p>Initially re-focusing capacity onto core statutory duties to support reductions in demand over time, supported by the Safety Valve Transformation</p>

Dept./Division	Ref	Proposal	Impact	Mitigation measures/comments
<p style="text-align: center;">Children and Adult's Services</p>	<p style="text-align: center;">Fees & Charges</p>	<p style="text-align: center;">Adult Community Learning Charges</p>	<p style="text-align: center;">Negative</p>	<p>Programme, and reintroduce wider preventative and non-statutory support offer in future.</p> <p>The equalities risks level assigned to these proposals will have mitigating actions, which will see these proposals terminated and replaced with alternative proposals if we are unable to reduce overall demand for the service successfully through the wider transformation programme.</p> <p>Potential negative impact identified for some groups: Race/Ethnicity; Disability; socio-economic disadvantage.</p> <p>The cost increases are minimal but we recognise this is still within the context of significant difficulties for our communities in relation to the cost of living. Existing mitigation for those experiencing financial hardship is in place with the means tested concessionary fee remaining significantly below the standard fee, continued access to a number of free courses available universally, and retained discretionary application of fees within the service.</p>

7. Summary of key areas and key findings

7.1 Key findings

Where potential negative, disproportionate or adverse impact has been identified for age, disability, race/ethnicity, socio-economic disadvantage, religion or pregnancy and maternity, mitigation actions have been considered and identified in the summary table presented. Budget proposals have also been further discussed and considered by Cabinet and Cabinet Leads as outlined in 7.2 below.

Key importance to note is also the relationship in some budget proposal areas of socio-economic disadvantage with protected characteristics of race/ethnicity and religion/belief; disability; and age. With further data insight it will also be important to note the relationship with the protected characteristic of sex and socio-economic disadvantage as well, together with other protected characteristics such as race/ethnicity, age and disability in these areas.

As part of the Council's wider EDI work and implementation of the Southwark Equality Framework there will be on-going monitoring for equality impact of the budget proposal service areas and implementation of decisions. This is also part of the business planning and review process and council wide EDI work. It is an on-going and active process.

Cumulative equality impact will need to be kept under review for those experiencing socio-economic disadvantage and protected characteristics using further data insight and periodic reviews (e.g. 1-3 year period). It must be noted however, that mitigating actions have been put in place in all areas where negative impact has been identified and/or will be further looked at as part of implementation of proposals.

Feedback received from EHRP in relation to specific EINAs as well as overall comments such as the need to improve data insight, analysis and use will be taken forward as part of work to strengthen development and implementation of EINAs and budget proposals with departments. It will also be used in the overall work to implement the Southwark Equality Framework and the EINA process as outlined above.

As part of review and improvements to the Budget equality analysis process, we will be undertaking workshops and discussions with departments on the overall EINA process as well as specific sessions on the budget EINA process. The overall aim is to start detailed work with departments at an early stage in the summer. We will also work with the Director of Finance and senior management to see how to better embed the EINA process as outlined above within improvements to the Budget planning process.

Further detailed guidance on the EINA process will also be provided to departments as part of planned workshops and meetings. This will include further guidance on negative, disproportionate and adverse impact, as well as the positive duty to promote equal opportunity and advance equality, understanding and meeting diverse needs and the promotion of good community relations.

7.2 Budget proposal process and EINAs

To inform the budget proposal decision making stages through to Cabinet in February, all Cabinet leads will have been briefed and given feedback on budget proposals and the relevant equality impact and needs analysis (EINAs). Through this process, further work has been undertaken with departments of budget proposals and any associated analysis.

Full EINAs as outlined in the summary table will also be produced as part of outlined future re-design of service areas and will be monitored for on-going equality impact. In addition, key service areas will also be undertaking full EINAs of budget proposal areas as part of wider on-going monitoring for equality impact/EDI action planning, as part of business planning and review.

Feedback from EHRP on individual EINAs will be addressed as part of the on-going monitoring for equality impact of these and the further development of these in the three year Budget strategy.

Full EINAs will also be undertaken as part of the implementation of those budget proposals with mainly staffing implications and will be made available subject to data protection considerations (for example, where numbers are small and staff could be identified, these will not be made publically available, but will be part of wider workforce monitoring reports produced by Human Resources).

7.3 Addressing gaps in information; and wider Council wide data insight work

Data and information, including quantitative and qualitative information, including research both local and national, lived experiences and insight are crucial for an adequate and robust EINA process. Work has begun at a Council wide level to address gaps and build our data insight work. This will further help improve the EINA process and equality action planning work. Further work to implement the Southwark Equality Framework (e.g. equality monitoring systems and analysis; consultation and engagement; equality data mapping etc.) are also key to EINAs and evidenced based equality action planning and practice. Currently as well there is much data insight work being progressed at Ward and Neighbourhoods level, which will be crucial to council wide EDI work.

7.4 Consultation and the EINA process: EINAs as consultation in action

As part of work to implement the Southwark Equality Framework, further work will be undertaken with departments to show the importance of building the EINA process at the start of project plans and action planning for consultations and engagement and project planning as a whole, in all areas which have relevance to EDI.

7.5 Further work with departments as part of the implementation of the Southwark Equality Framework; meetings, discussions and workshops on the EINA process, budget proposal process, business planning, review and equality action planning.

As part of work to implement the Southwark Equality Framework, further work will be action planned to improve the EINA process as a whole, including further detailed guidance for departments and training workshops. Specifically in relation to the Budget proposal decision making processes, further meetings will be undertaken at an early stage with DMTs and SMTs.