

BUDGET SAVINGS PROPOSAL 2019/20

High Level Initial Cumulative Equality Impact Assessment

Introduction

The Council's in its annual budget-setting process is required to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making decisions on budget proposals.

This initial high level overview of the assessment of the budget proposals helps give an early indication of likely impacts on particular groups. The assessment focuses on service based proposals that are identified as having a direct impact on service users/residents. Budget proposals which are efficiency savings or income generation that do not have any disproportionate impact for service users/residents within the equalities legislation are not included in the initial assessment. It is important to note that implementation of the proposals will not take place until the Full Equality Impact Assessment has been undertaken.

Equality Impact Assessments (EIAs) have been completed on all budget proposals with a potential impact on service-users, related to their legally protected characteristics. EIA process will help:

- understand the potential effects of budget proposal by assessing the impacts on different groups
- identify any adverse impacts and develop actions to remove or mitigate them
- transparent decision making based on evidence

Each service area has conducted an initial assessment to identify potential equality impacts on budgets proposals. Service areas will gather relevant data and evidence from consultations to support a full assessment of their proposals, if required. Full EIA of budget proposals and implementation plans will be published following a rigorous assessment of equality impacts.

Further assessment will be made through the budget consideration process and in relation to implementation, if budget proposals are accepted. An assessment of the cumulative impacts across all budget proposals will be available with the budget papers for full council in February 2019.

Public Sector Equality Duty

The Public Sector Equality Duty requires councils to demonstrate their consideration of the Equality Duty as part of the process of decision-making. This involves an understanding of the potential impact of policy and decisions on different people and evidence on how decisions were reached. While there is no legal requirement to conduct an Equality Impact Assessment, the process enables a rigorous assessment of decision- making and identifies any negative and positive impact on people with protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership, but only in respect of the requirements to have due regard to the need to eliminate discrimination.
- Pregnancy and maternity
- Race ethnic or national origins, colour or nationality
- Religion or Belief including lack of belief
- Sex (Gender)
- Sexual orientation.

It is important to fully understand the impact of the budget proposals on equality groups. The Council, working with others, will need to take action to mitigate the collective impact of any such proposals. Feedback from the public consultation on budget proposals will be incorporated into the relevant individual Equality Impact Assessments and reflected in the Cumulative Impact Assessment to full council in February 2019.

Crucially, this is an ongoing process of gathering evidence to monitor and evaluate impacts. As individual budget proposals are developed and implemented, they will be subject to further assessment. This assessment also describes mitigating actions that will need to be considered.

The initial equality impact assessment process includes:

- Service areas identifying proposals which in their view require an Equality Impact Assessment (EIA).
- All the budget proposals screened by the strategic policy team to check whether an EIA is required and are likely to have a disproportionate equalities impact on particular groups of residents.

This high level overview assessment will be updated following feedback from residents, service users and partners as part of the public consultation process.

Below, is a summary of budget proposals that have been identified as having an impact on protected characteristics and require an EIA.

Age (Older people)

Older vulnerable people are more likely to access and rely on Council services. The older adult population has and will continue to rise in Birmingham, with increases of 24% for those aged 85+ years expected in the next 10 years. Nearly a fifth of households being older people are living alone with health problems and/or disability. There proposals that have a high risk of impacting on older people are set out below.

Funding of Equipment Loan Store

The change being proposed is to make use of the capital resources budget to pay for larger items of equipment which will continue to help people remain independent in their own homes and communities.

There will be no change from the service user perspective. The change relates only to how specific equipment is funded by maximising the use of capital resources to help people remain independent in their own home and community, in line with the Birmingham vision for adult social care and health. The budget consultations will help identify any impacts for older people.

Financial Assessment for Care & Support

Refining the current system for Financial Assessments aims to create a more efficient, fairer system of charging for those who access non-residential care. This will focus on the allowances and disregards including disability related expenditure that are included in the financial assessment. The financial assessment will remain individual to the client and uphold the principles in the Care and Support Statutory Guidance to ensure that people are not charged more than it is reasonably practicable for them to pay. There is expected to be an increase in care contributions from some service users who upon reassessment are deemed to be able to contribute an increased amount.

Where disability-related benefits are taken into account, the Council will make an assessment and allow the person to keep enough benefit to pay for necessary disability related expenditure to meet any needs which are not being met by the Council. The care and support plan will be a guide to support any Disability Related Expenditure or satisfactory evidence will be required. For example, copies of utility bills will evidence where above average heating costs should be considered.

New clients coming into service will not be adversely affected by this proposal. The churn in service and 12 month review programme will mean that many existing clients will not be affected and those who will be affected will be managed carefully through a face to face financial assessment to ensure no financial hardship.

To reduce the amount of books purchased for the Library Service

There will be a reduction in the number of new books and other resources being available in libraries. Choice and availability will reduce, for example books of a broader interest such as classic novels will be limited further. We will continue to look for opportunities to maximise financial efficiency and get the maximum value for residents of Birmingham.

A comprehensive service including digital resources will complement the availability of reading material and reflect the diverse needs of library users

We would look to prioritise remaining spend in areas that address protected characteristics and vulnerable groups such as children, the elderly and those with a disability. The consequence of this would be that those services which support economic mobility such as study, business and skills support would cease.

The impact of reduced opening hours may adversely impact on older library users who due to disability may face additional difficulty in accessing a more limited library service. We will assess the impact on users through additional consultation and appropriate mitigation implemented where it is reasonable to do so.

Channel shift call reduction

With the implementation of the council's new online account (BRUM), by the end of 2018/19 it will be easier for citizens to transact with the council online without the need for a telephone call for most aspects of the following services: Parks, anti-social behaviour, Highways, Environmental Health, Waste Management, Council Tax, housing repairs and Housing Benefits services.

Through promoting the new online account we would encourage citizens to sign up to enable them to transact online rather than having to speak to the council. It would essentially mean that we could reduce call volumes at the contact centre as more citizens transact online. We would signpost all citizens to the website, except those identified as vulnerable such as older people who are digitally excluded. We will explore options for those service users who are digitally excluded.

HIV/TB Support

The service is commissioned to provide support to people living with HIV and TB, who are either resident in Birmingham, or receiving their medical treatment in Birmingham, as well as those concerned about HIV/TB exposure. The service provides wider support activity such as advice, information, housing support and support with testing.

There are 2 elements to the HIV service - children under the age of 18 and adults. At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service.

We have to engage with the children's service team and the Regional Paediatric HIV team, based at Heartlands Hospital to understand the impact on children and their parents/carers specifically. The TB service is for adults only. The views of Clinicians and nurses from The Birmingham and Solihull TB service will be gathered through the SME group. The consultation will help identify any adverse impact on children and mitigating actions.

Energy Savings from Highways Assets

There will be a reduction in the lighting levels provided to our road network. However this reduction will be within acceptable limits when measured against adopted national standards and industry best practice. For clarity this proposal will ensure that the required safe lighting levels are maintained on all roads at all times.

This proposal may have impact on fear of crime and local factors may influence the impact on specific groups. To safeguard against any impacts on community safety the public consultation will take into consideration impacts of the proposal. Measures will be considered to mitigate any negative impacts identified.

Legal Entitlement & Advice Service (LEAS)

The proposal is to cease the Legal Entitlement and Advice Service budget, used to commission Third Sector partners to deliver independent advice relating to welfare benefits, debt management and employment through open door access at Saltley Advice Centre, the Citizens Advice Birmingham service point in Corporation Street, Birmingham Settlement in Aston and Spitfire Advice Services in Castle Vale.

There will be an impact on local residents who will be unable to gain the support previously available to them from third sector providers. By the very nature of the service, it is accessed by some of the most vulnerable people of Birmingham. The current contract is being delivered by Citizens Advice Birmingham, Spitfire Advice Services and Birmingham Settlement, which ends on 31st March 2019. An Advice & Information Service will still be available to citizens of Birmingham by means of the Council website, Council Contact Centre and its Neighbourhood Advice Service and potentially still via third sector advice providers who may be able to secure funds from other sources.

Proposal to cease LEAS budget, which is a non-statutory service, would lead to a reduction in the level of provision available which would have impact on local advice provider's capacity to meet the demands for services to vulnerable adults, children and vulnerable older people affected by the Welfare Reform Act.

All sectors of the community are potential service users. However it is unlikely that any single protected group would be disproportionately affected by this proposal. The consultations will help identify any adverse impacts on legally protected groups.

Pest Control (partial cost recovery for domestic rat treatments)

The proposed change is to make a contributory charge of £25 for pest control treatments for rats in domestic houses and gardens. This is designed to help to maintain protection of vulnerable people and people on low incomes by only taking a contributory payment to offset the overall cost. This change will enable the City to continue to offer a service which will be significantly more affordable than introducing a service on a full cost recovery basis

The charge will be cheaper for residents than obtaining a similar service from a commercial company. We will also upload more details on our web pages as to how residents can explore alternative options. The option of providing a means-tested free service to the elderly and vulnerable has been looked at but it is considered that the administrative cost of validating requests would be both time-consuming and financially disproportionate.

We will monitor those who report that they cannot access the service and we will explore the possibility of enabling people in receipt of welfare benefits or council tax subsidy to be able to be offered a free or reduced cost service.

Cease handling Garden Waste payment calls at corporate contact centre

It is proposed that from January 2019 where citizens do not meet the vulnerability criteria, we only allow for the renewal of garden waste collections online, which will be supported by the introduction of automated renewals in the Brum Accounts. We would advise citizens about this change when we communicate with them about their renewal and also have messaging on our telephone lines. In January as part of the new Brum account functionality citizens can also set this up as a recurring annual payment from their card.

Although the contact centre has additional resource in place to deal with high call volumes during the renewal period, due to early bird incentives there can be high wait times. Therefore citizens will be able to quickly and securely renew online and this will also save the citizen time. However, those identified as vulnerable such as older people or and those who are digitally excluded, we will continue to deal with

their calls.

We are currently reviewing the creation of vulnerability criteria and if citizens are classed as vulnerable and unable to transact online, we would continue to deal with their calls.

AGE (Younger service users)

Based on 2016 ONS projections, between 2018 and 2022 children under 15 are due to increase by 3%. Of these, children aged 0 to 4 are due to grow by 1.5% to 86,000 children, but the latest growth rate in Birmingham children will be the 10 to 14 age group – increasing by 6.0% to 84,900. More than 40% of Birmingham's school children have a first language that is known or believed to be other than English (42%). Over 1 in 3 children in Birmingham are living in poverty. Despite the overall improvement in GSCE levels there are still significant differences in educational attainment between certain social groups in the city. Increasingly we find that white boys from poorer economic backgrounds underachieve at school, compared to their peers in other ethnic groups.¹ Gypsy, Roma and Traveller children experience some of the worst educational outcomes of all ethnic groups, regardless of gender. Some of the proposals below are likely to have an impact on children and young people.

Education infrastructure

The proposal is to further review a number of arrangements within the current 4 Private Finance Initiative (PFI) contracts which are in place across 28 schools and settings. This will include:

- Reviewing contractual obligations to drive efficiencies.
- Reviewing energy provision across all contracts
- Reviewing school contributions against the wider Birmingham school estate and national benchmarks.
- Reviewing PFI insurance premiums.

This would mean having sufficient resource and subject matter expertise to effectively manage and challenge aspects of the PFI contract and negotiate changes on behalf of the council.

The main focus of the impact will be on negotiations with the Facilities Management companies with limited direct impact on school operations. Any consideration to increase school payments would only be taken to ensure that charges were proportionate to those in non PFI schools. We will monitor and evaluate any adverse equality impacts.

Education Safeguarding

A minimal subscription has been required of schools to cover training events. Currently 96% of schools subscribe. This year the subscription will rise by approximately 30%, (rates vary depending on the key stage of the school and on the pupil numbers). There is a risk that fewer schools will subscribe with the increase subscription charges.

Previously a minimal charge had been made to schools for non-core training which required further subsidy. The subscription rates have now been revised and the service is now able to cover the cost of these operations allowing the subsidy to be returned.

Increased charges have been kept to minimum to reflect the costs of delivering the non-statutory support. However, we will monitor any adverse equality impacts.

School & Governor Support

School and Governor Support provide professional support and advice to schools and academies. This support is provided by email, telephone and face-to-face. It also involves work with schools where there may be concerns as a result of finance, governance, leadership or other issues. The service establishes Interim Executive Boards for schools that need improvement where relevant. School and Governor Support has been a fully traded service since 2011 and 99% of maintained schools buy the service. The service has a statutory element and some activity is linked to certain powers to direct the appointment of members of education committees, duty to secure training and support governors and intervention regarding schools causing concern.

The increase will be kept to a minimum and the traded model remains an optional service which schools can choose to subscribe to. However given that the service is provided directly to schools in the form of advice and support is purchased by schools on a voluntary basis it is not believed that this will be a significant impact.

Building & Property

Special Education Needs and Disability Information Advice and Support Service (SENDIASS) currently deliver its service from a community centre. In line with the wider changes proposed in response to the recent local Birmingham SEND inspection this service will be re-located to avoid current building charges. The level of service delivery would remain unchanged but the location which staff operated from for administrative duties would change.

Any new venue for SENDIASS would be identified to ensure appropriateness and accessibility for the families they support. This could include looking to co-locate with another agency which would enhance the support which SENDIASS could offer.

Consideration will be given to how future venues are appropriate and accessible for children and young people. This will be reviewed as further discussions take place on future venues.

Children's Trust

The contract with the Trust will be reduced for the financial year 2019/20 through a contract variation, as part of annually agreed contract negotiations. The Trust will seek to achieve the saving through improved efficiency, support service transformation and more effective demand management around alternatives to care. The Trust model allows for flexibility in delivery planning and there are no plans to reduce service levels to achieve this saving

It will be achieved through changes to how the Trust organises services and delivers alternatives to care.

More detailed plans are being made for how this contractual saving will be delivered. It is planned to achieve this through greater efficiency and demand management. Given that the services are delivered to Children there will be an impact on age as a protected characteristic. Once firmer proposals are made, including details on any changes to staffing, then a fuller equality assessment can be carried out and impact mitigated.

Travel Assist

Travel Assist provides a variety of transport options to over 4,250 children on a daily basis, with an additional 1,500 receiving bus passes and has an overall budget of £18.4m for 2018/19. The majority of the children using the service have requirements related to SEND but the service also supports looked after children; children in temporary accommodation and other vulnerable groups. The service operates more than 590 routes and has a range of support options including: 1-to-1's; mini bus/coach transport; Travel Guides; personal transport budgets; bus passes and independent travel training.

It is proposed that the service strengthens the offer to parents to make decisions that best suit them and their families, through the use of personal transport budgets; widen the offer for independent travel training and make available a wide variety of transport options for families, and promote independence.

The service will continue to deliver its statutory duties, and will focus on improving the offer currently available to school-age children. We will undertake a comprehensive consultation on any proposed changes to the Travel Assist Service. This will involve parents/carers and schools; alongside health and children's social care colleagues. We want to strive toward co-production in this next stage of the development of the service.

There will still be a two stage appeal process for any families who wish to appeal any decisions made regarding initial offers of transport support.

Any proposed changes to existing travel arrangements will be preceded by a review, and risk assessment where necessary, and early notification for the family.

Travel Assist is part of the family of SEND services, which will be subject to review in line with the findings of the SEND Inspection in June 2018. As more children are able to access suitable education placements within the city, the need and demand for travel support will reduce. However, this must be balanced with the current modelling with regards to SEND which shows a continuing expected increase in the numbers of children with SEND in the city.

Reduce Local Welfare Provision funding

It is proposed that the Local Welfare Provision for 'white goods' and furniture is reduced. The proposal will leave the crisis element for food and utilities at its current level. The Service has managed the previous reduction by working with voluntary suppliers of 'white goods' and furniture to supply goods in the first instance and will continue to signpost to those organisations. White goods from voluntary suppliers are all subject to a charge and some also charge a reduced amount for furniture.

A good network of contacts has been established for the provision of white goods and furniture. We will continue to work with the voluntary sector to provide assistance for people in need This will help individual cases and provide people with information to signpost to alternative areas/agencies for support. We will monitor any adverse impact on children and families and put in place appropriate mitigations.

Employment and Skills Cross Directorate Rationalisation

It is proposed that a new single Education and Skills service is created through a harmonisation process bringing together the range of education, employment and skills services currently held across 3 Directorates.

The new service will seek to better align a range of Council Services which tackle education, employment and skills activities. Currently these services sit across three different Council Directorates which leads to a fragmented provision to Birmingham residents. It is expected that the proposal will lead to an improvement in the Birmingham education and skills offer and more effectively address some of the more difficult skills challenges the city faces by developing a single service able to develop a whole-life approach to education and skills pathways.

Reduction of staff in services which provide employment and skills support to the most vulnerable carries a risk. However, the harmonisation of a number of Council services supporting education, employment and skills is intended to enable greater joined up of provision and therefore is intending/expecting to have a positive effective. It is hoped we will be able to break down silos and fragmented support and create more seamless 'cradle to grave' pathways. Ongoing monitoring will help identify any impacts.

Energy Savings from Highways Assets

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This proposal may have impact on community safety and fear of crime. Public consultation will take into consideration local factors which may influence the impact on specific groups. Measures will be considered to mitigate any negative impacts.

Withdrawal of Funding from School Crossing Patrols

The provision of School Crossing Patrols will depend on the decisions of individual schools, and over time the pattern of staffed crossings will vary across the City reflecting schools' (and parents) ability and willingness to pay for the service. This may result in an inequitable service not necessarily aligned with need or the level of road traffic risk to children.

There is no statutory requirement for the council to provide the service and parents and guardians are legally responsible for their child's safety on the journey to school. However, the council will still provide Wardens where they are paid for and will offer training, supervision, uniform and site risk assessments for volunteers or other school-based staff where requested. The policy will be phased in as vacancies arise allowing schools time to determine whether or not they wish to pay for the service.

To mitigate, the council has set up the Young Active Travel Charitable Trust which provides small grants to schools to help them develop their school travel plans, to encourage more children to walk, cycle or scoot to school; and to improve their safety on the journey to school.

This service is provided by a predominantly older staff group (66% are over 60 and 29% are aged 70+), to a younger age group (primary school children) so there is potential for a disproportionate impact on these groups (age being one of the protected characteristics).

The nature of the job role requires Crossing Wardens to be employed on a part-time basis. The Part-Time Workers Regulations of 2000 protect part-time workers from being treated less favourably than equivalent full-time workers

School Crossing Patrols tend to be concentrated in more urbanised areas of the City, which are likely to correlate to significant minority ethnic populations, including newly arrived communities and those with support needs. Schools in wealthier areas may more easily raise funding to voluntarily pay for Wardens and this may mean that children in more economically deprived circumstances may be disadvantaged (although poverty is not in itself a protected characteristic there are correlations with disability and the City's ethnic demographics). The rate of fatal and serious injuries

to children (aged 5 to 9) living in the 20% most deprived areas is nine times higher than in the 20% least deprived. 170 of the 189 P1 sites are located in the worst five quintiles of deprivation in the country (IMD 2015) with almost half of those in the worst 10% and a quarter in worst 5% ie the most intensely deprived communities

Pest Control (partial cost recovery for domestic rat treatments)

The proposed change is to make a contributory charge of £25 for pest control treatments for rats in domestic houses and gardens. This is designed to help to maintain protection of vulnerable people and people on low incomes by only taking a contributory payment to offset the overall cost. This change will enable the City to continue to offer a service which will be significantly more affordable than introducing a service on a full cost recovery basis

The charge will be cheaper for residents than obtaining a similar service from a commercial company. We will also upload more details on our web pages as to how residents can explore alternative options. The option of providing a means-tested free service to the elderly and vulnerable has been looked at but it is considered that the administrative cost of validating requests would be both time-consuming and financially disproportionate.

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Children in families on low income and people with disabilities on low incomes may be disadvantaged by this change. However, the charge has been kept at a low contributory amount and there is the option to self-treat for rats. We will monitor those who report that they cannot access the service and we will explore the possibility of enabling people in receipt of welfare benefits or council tax subsidy to be able to be offered a free or reduced cost service.

Fees and Charges Review – Parks

This proposal will review and reduce the subsidy provided to sports pitch hire, by increasing charges and/or reducing the cost of maintenance and remove the non-commercial discounts for event space hire at the major parks in the City. Also review car parking charges and Cannon Hill Park and implement car parking charges across the major parks in the City (Sutton Park, Lickey Hills, Rectory Park, Victoria Common, and Edgbaston Reservoir).

The proposal will impact on a range of service users and people who access sports and other facilities within Birmingham Parks. It breaks into 3 elements: reducing subsidy on sports pitch hire; removing the non-commercial rate for events space hire in major parks; and reviewing car parking charges in Cannon Hill Park and introducing charges in other parks

The proposal to reduce the subsidy attached to the hire of sports pitches will impact on all of those who hire and access sports facilities, which may have a disproportionate impact on disadvantaged communities including young people who access sports facilities in this area.

This will be partially mitigated by the retention of concessionary pricing for young people across most services. Regular reviews on the impact of increased pricing on pitch usage will be undertaken to monitor the impact. The proposal will have an impact on some protected characteristics, however these will be mitigated by: continuing to offer concessionary rates where appropriate; signposting charities and voluntary groups to other park assets where a non-commercial discount are available; and provision of free car parking for blue badge holders and promotion of alternative transport options. Consultation with stakeholders will help identify any adverse impacts.

Consolidation Project – Transport Work stream

It is proposed to manage the Council's transports functions from a central team rather than across multiple Directorates. This will ensure a more strategic approach to fleet and plant management and lead to improved service delivery and lower cost. This means reviewing those Council functions that currently deliver or support services that use transport and designing a structure and governance to remodel the service delivery. This would include:

- Reviewing the current structure, staff and services currently in scope with associated budgets.
- Developing a detailed design including roles/responsibilities, property requirements, skills required and services to be provided.
- Reviewing current systems, data, strategies and policies in place.

The aims would include:

- Generating cost savings through implementation of Council wide transport standards, updating policies and contracts, governance & procedures and improving asset management.
- Reducing where possible the costs of staffing, systems and travel arrangements.
- Generating income from collaboration or providing services to 3rd parties.

Whilst the scope of the ITU is yet to be fully established, one design option is that the home to school transport function and the adults day care transport could come within it. Therefore the review will need to be mindful of Equality Impact Assessments that have been carried out on those services and review them as the design proposals and implementation progress.

Gender/Sex

Birmingham's population is made up of 50.5% females and 49.5% males.¹ Gender inequality and gender-based violence does not just negatively affect women but whole families and communities. Women with a long-term illness or disability are more than twice as likely to have experienced domestic abuse in the last year as other women. Women from mixed/multiple ethnic groups were more likely to have experienced domestic abuse in the last year than any other ethnic group. Some of the proposals below are likely to have an impact on gender as protected characteristic.

Bharosa

The long term proposal is to ensure the Bharosa service is aligned to key public health outcomes and delivers against the Domestic Violence Strategy. In order to achieve this, it is assumed that the service will be directly funded by Public Health for a period while options are prepared for future service delivery. Implementation of a new service delivery model will follow to ensure the service delivers against the Domestic Violence Strategy and key Public Health outcomes. Future proposals will be consulted on.

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Funding is being put in place now to allow time for careful consideration of the possible options and ensuring the one which achieves the best possible outcome is implemented. The service is being reshaped to better meet outcomes rather than being removed. Further mitigating action will be taken once work progresses on developing the options.

HIV/TB Support

The service is commissioned to provide support to people living with HIV and TB, who are either resident in Birmingham, or receiving their medical treatment in Birmingham, as well as those concerned about HIV/TB exposure. The service provides wider support activity such as advice, information, housing support and support with testing.

The HIV service is used by males and females in equal numbers, 30 and 34 at the last quarters report. Within the wider cohort there are specific gender based groups with higher risk indicators - MSM, black African men and women. For TB there are no gender specific issues as this is an airborne transmitted infection. At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service. The views of subject matter experts will be sought.

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Reduce Local Welfare Provision funding

It is proposed that the Local Welfare Provision for 'white goods' and furniture is reduced. The proposal will leave the crisis element for food and utilities at its current level. The Service has managed the previous reduction by working with voluntary suppliers of 'white goods' and furniture to supply goods in the first instance and will continue to signpost to those organisations. White goods from voluntary suppliers are all subject to a charge and some also charge a reduced amount for furniture.

A good network of contacts has been established for the provision of white goods and furniture. We will continue to work with the voluntary sector to provide assistance for people in need. This will help individual cases and provide people with information to signpost to alternative areas/agencies for support.

Legal Entitlement & Advice Service (LEAS)

The proposal is to cease the Legal Entitlement and Advice Service budget, used to commission Third Sector partners to deliver independent advice relating to welfare benefits, debt management and employment through open door access at Saltley Advice Centre, the Citizens Advice Birmingham service point in Corporation Street, Birmingham Settlement in Aston and Spitfire Advice Services in Castle Vale.

Disability

One in four adults in the West Midlands has a mental health issue. Particular groups of people are at greater risk of mental illness, including people from BME communities, lesbian, gay, bisexual and transgender (LGBT) people. In Birmingham around 1% of supported working age adults with a learning disability are in in paid employment compared to the England average of 5.8%, this relates to just 21 in 2,166 people¹. Giving disabled people autonomy and control in their own lives and breaking down' disabling barriers' will enable greater participation in the opportunities the city has to offer.

There will be an impact on local residents who will be unable to gain the support previously available to them from third sector providers. By the very nature of the service it is accessed by some of the most vulnerable people of Birmingham. The current contract is being delivered by Citizens Advice Birmingham, Spitfire Advice Services and Birmingham Settlement, which ends on 31st March 2019. An Advice & Information Service will still be available to citizens of Birmingham by means of the Council website, Council Contact Centre and its Neighbourhood Advice Service and potentially still via third sect advice providers who may be able to secure funds from other sources

Proposal to cease LEAS budget, which is a non-statutory service, would lead to a reduction in the level of provision available which would have impact on local advice provider's capacity to meet the demands for services to children and vulnerable older people affected by the Welfare Reform Act.

All sectors of the community are potential service users. However it is unlikely that any single protected group would be disproportionately affected by this proposal. The consultations will help identify any adverse impacts on legally protected groups

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The service is commissioned to provide support to people living with HIV and TB, who are either resident in Birmingham, or receiving their medical treatment in Birmingham, as well as those concerned about HIV/TB exposure. The service provides wider support activity such as advice, information, housing support and support with testing.

Across both elements of the service there is minimal prevalence of disability but HIV is classed as long term chronic conditions under disability and mental health, whilst often unreported, is known to be a contributory factor in referrals to HIV support. There is a very small cohort of people who have double infection of both HIV and TB. At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service to support disability related needs. The views of subject matter experts will be sought to put in place any mitigations.

Building & Property

Special Education Needs and Disability Information Advice and Support Service (SENDIASS) currently deliver its service from a community centre. In line with the wider changes proposed in response to the recent local Birmingham SEND inspection this service will be re-located to avoid current building charges. The level of service delivery would remain unchanged but the location which staff operated from for administrative duties would change.

Any new venue for SENDIASS would be identified to ensure appropriateness and accessibility for the families they support. This could include looking to co-locate with another agency which would enhance the support which SENDIASS could offer.

Consideration will be given to how future venues are appropriate and accessible for children and young people. This will be reviewed as further discussions take place on future venues.

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A good network of contacts has been established for the provision of white goods and furniture. We will Continue to work with the voluntary sector to provide assistance for people in need. This will help individual cases and provide people with information to signpost to alternative areas/agencies for support.

Legal Entitlement & Advice Service (LEAS)

The proposal is to cease the Legal Entitlement and Advice Service budget, used to commission Third Sector partners to deliver independent advice relating to welfare benefits, debt management and employment through open door access at Saltley Advice Centre, the Citizens Advice Birmingham service point in Corporation Street, Birmingham Settlement in Aston and Spitfire Advice Services in Castle Vale.

There will be an impact on local residents who will be unable to gain the support previously available to them from third sector providers. By the very nature of the service it is accessed by some of the most vulnerable people of Birmingham. The current contract is being delivered by Citizens Advice Birmingham, Spitfire Advice Services and Birmingham Settlement, which ends on 31st March 2019. An Advice & Information Service will still be available to citizens of Birmingham by means of the Council website, Council Contact Centre and its Neighbourhood Advice Service and potentially still via third sect advice providers who may be able to secure funds from other sources Proposal to cease LEAS budget, which is a non-statutory service, would lead to a reduction in the level of provision available which would have impact on local advice provider's capacity to meet the demands for services to children and vulnerable older people affected by the Welfare Reform Act.

All sectors of the community are potential service users. However it is unlikely that any single protected group would be disproportionately affected by this proposal. The consultations will help identify any adverse impacts on legally protected groups.

Fees and Charges

An approach is being undertaken across the council to support the ongoing sustainability of fees and charges across a range of services. A review of fees and charges will ensure that services recover the total cost of delivery or where appropriate, return a surplus to be re-invested in the ongoing delivery of other services.

A range of information is being utilised to support the review, including cost information, charges in similar local councils and also charges levied by other providers (e.g. private businesses) to deliver a consistent approach to charging across the organisation.

The initial equality impact demonstrates that increasing discretionary fees and charges by an average of 5% for the next 2 years will impact on all citizens/service users and not have a specific detrimental impact on any group with a protected characteristic.

However consideration will be given to any element that is identified as having a disproportionate impact on one or more protected characteristic and a separate EIA will be undertaken as part of the approval process for fees and charge within each relevant service area. Ongoing monitoring will identify any adverse impacts on service users/residents.

Children's Trust

The contract with the Trust will be reduced for the financial year 2019/20 through a contract variation, as part of annually agreed contract negotiations. The Trust will seek to achieve the saving through improved efficiency, support service transformation and more effective demand management around alternatives to care. The Trust model allows for flexibility in delivery planning and there are no plans to reduce service levels to achieve this saving

There are no plans to reduce service levels to achieve this saving. It will be achieved through changes to how the Trust organises services and delivers alternatives to care.

More detailed plans are being made for how this contractual saving will be delivered. It is planned to achieve this through greater efficiency and demand management. Given that the services are delivered to Children there will be an impact on age as a protected characteristic. Once firmer proposals are made, including details on any changes to staffing, then a fuller equality assessment can be carried out and impact mitigated.

Travel Assist

Travel Assist provides a variety of transport options to over 4,250 children on a daily basis, with an additional 1,500 receiving bus passes and has an overall budget of £18.4m for 2018/19. The majority of the children using the service have requirements related to SEND but the service also supports looked after children; children in temporary accommodation and other vulnerable groups. The service operates more than 590 routes and has a range of support options including: 1-to-1's; mini bus/coach transport; Travel Guides; personal transport budgets; bus passes and independent travel training.

It is proposed that the service strengthens the offer to parents to make decisions that best suit them and their families, through the use of personal transport budgets; widen the offer for independent travel training and make available a wide variety of transport options for families, and promote independence.

The service will continue to deliver its statutory duties, and will focus on improving the offer currently available to school-age children. We will undertake a comprehensive consultation on any proposed changes to the Travel Assist Service. This will involve parents/carers and schools; alongside health and children's social care colleagues. We want to strive toward co-production in this next stage of the development of the service.

Any proposed changes to existing travel arrangements will be preceded by a review, and risk assessment where necessary, and early notification for the family.

Operational Hub Programme

Operational premises in scope include community centres, youth centres, adult education centres, leisure centres, community centres, day care centres, housing offices, children's centre etc. This mirrors the Operational Property theme within the new Property Strategy to be approved by Cabinet shortly. As a result, a number of poorly maintained, poorly sited single service premises will be decommissioned and disposed of. It is recommended that the initial activity be focussed on the City Council's own property holdings with medium and long term solutions sought with public and third sector partners. However, this will mean a notable reduction in the number of direct service outlets being offered, e.g. libraries, youth centres, community centres etc.

It is envisaged that the new "hub" buildings will be open longer and on more days than many existing facilities and will not be badged under a particular service making the buildings more accessible and available for multiple uses. These hubs will be supported through a range of additional facilities, "spokes". These may comprise facilities located within buildings leased by the City Council to third sector organisations or service access points in retained City Council single service outlets. The City Council would also attempt to capture and hold details in a directory of facilities across the sectors that are available for groups to hire.

Once the services where changes are identified are known the relevant service area it will be expected to undertake a full EIA. Consultation on proposal will identify impact on protected groups.

Fees and Charges Review – Parks

This proposal will review and reduce the subsidy provided to sports pitch hire, by increasing charges and/or reducing the cost of maintenance and remove the non-commercial discounts for event space hire at the major parks in the City. Also review car parking charges and Cannon Hill Park and implement car parking charges across the major parks in the City (Sutton Park, Lickey Hills, Rectory Park, Victoria Common, and Edgbaston Reservoir).

The proposal will impact on a range of service users and people who access sports and other facilities within Birmingham Parks. It breaks into 3 elements: reducing subsidy on sports pitch hire; removing the non-commercial rate for events space hire in major parks; and reviewing car parking charges in Cannon Hill Park and introducing charges in other parks

The proposal to reduce the subsidy attached to the hire of sports pitches will impact on all of those who hire and access sports facilities, which may have a disproportionate impact on disadvantaged communities including young people who access sports facilities in this area.

This will be partially mitigated by the retention of concessionary pricing for young people across most services. Regular reviews on the impact of increased pricing on pitch usage will be undertaken to monitor the impact. The proposal will have an impact on some protected characteristics, however these will be mitigated by: continuing to offer concessionary rates where appropriate; signposting charities and voluntary groups to other park assets where a non-commercial discount are available; and provision of free car parking for blue badge holders and promotion of alternative transport options. Consultation with stakeholders will help identify any adverse impacts.

Contract Management Savings Opportunities

This proposal will re-tender the current Constructing West Midlands Frameworks Lots 1-4 and the Acivico building fabric and maintenance framework. Saving predicated on Cabinet decision on the future of services provided by Acivico being made at December Cabinet as report will enable the procurement process to commence. Saving will not be realised until Q3 2019/20.

We will look at contract extensions or in flight tenders.

We will look to negotiate a reduction in certain management fees. Saving predicated on further financial validation, Service area leads agreement to proceed and successful negotiations.

A reduction in the inspection frequency of lifts within corporate buildings whilst maintaining health and safety compliance – Saving predicated on Property Services validation and agreement to proceeding with this initiative. will consult with stakeholder to identify any equality impacts and put in place mitigating action where required.

Energy Savings from Highways Assets

There will be a reduction in the lighting levels provided to our road network. However this reduction will be within acceptable limits when measured against adopted national standards and industry best practice. For clarity this proposal will ensure that the required safe lighting levels are maintained on all roads at all times.

This proposal may have impact on fear of crime and local factors may influence the impact on specific groups. To safeguard against any impacts on safety the public consultation will take into consideration impacts of the proposal. Measures will be considered to mitigate any negative impacts.

Pest Control (partial cost recovery for domestic rat treatments)

The proposed change is to make a contributory charge of £25 for pest control treatments for rats in domestic houses and gardens. This is designed to help to maintain protection of vulnerable people and people on low incomes by only taking a contributory payment to offset the overall cost. This change will enable the City to continue to offer a service which will be significantly more affordable than introducing a service on a full cost recovery basis

The charge will be cheaper for residents than obtaining a similar service from a commercial company. We will also upload more details on our web pages as to how residents can explore alternative options. The option of providing a means-tested free service to the elderly and vulnerable has been looked at but it is considered that the administrative cost of validating requests would be both time-consuming and financially disproportionate.

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Children in families on low income and people with disabilities on low incomes may be disadvantaged by this change. However, the charge has been kept at a low contributory amount and there is the option to self-treat for rats. We will monitor those who report that they cannot access the service and we will explore the possibility of enabling people in receipt of welfare benefits or council tax subsidy to be able to be offered a free or reduced cost service.

To reduce the amount of books purchased for the Library Service

There will be a reduction in the number of new books and other resources being available in libraries. Choice and availability will reduce, for example books of a broader interest such as classic novels will be limited further. We will continue to look for opportunities to maximise financial efficiency and get the maximum value for residents of Birmingham.

A comprehensive service including digital resources will complement the availability of reading material and reflect the diverse needs of library users

We would look to prioritise remaining spend in areas that address protected characteristics and vulnerable groups such as children, elderly and those with a disability. The consequence of this would be that those services which support economic mobility such as study, business and skills support would cease.

The impact of reduced opening hours may adversely impact on older library users who due to disability may face additional difficulty in accessing a more limited library service. We will assess the impact on users through additional consultation and appropriate mitigation implemented where it is reasonable to do so.

Channel shift call reduction

With the implementation of the council's new online account (BRUM), by the end of 2018/19 it will be easier for citizens to transact with the council online without the need for a telephone call for most aspects of the following services: Parks, anti-social behaviour, Highways, Environmental Health, Waste Management, Council Tax, housing repairs and Housing Benefits services.

Through promoting the new online account we would encourage citizens to sign up to enable them to transact online rather than having to speak to the council. It would essentially mean that we could reduce call volumes at the contact centre as more citizens transact online.

We would signpost all citizens to the website, except those identified as vulnerable such as older people who are digitally excluded. We will explore options for those services users who are digitally excluded.

Cease handling Garden Waste payment calls at corporate contact centre

It is proposed that from January 2019 where citizens do not meet the vulnerability criteria, we only allow for the renewal of garden waste collections online, which will be supported by the introduction of automated renewals in the Brum Accounts. We would advise citizens about this change when we communicate with them about their renewal and also have messaging on our telephone lines. In January as part of the new Brum account functionality citizens can also set this up as a recurring annual payment from their card.

Although the contact centre has additional resource in place to deal with high call volumes during the renewal period, due to early bird incentives there can be high wait times. Therefore citizens will be able to quickly and securely renew online and this will also save the citizen time. However, those identified as vulnerable such as older people or and those who are digitally excluded, we will continue to deal with their calls.

Reduce Local Welfare Provision funding

It is proposed that the Local Welfare Provision for 'white goods' and furniture is reduced. The proposal will leave the crisis element for food and utilities at its current level. The Service has managed the previous reduction by working with voluntary suppliers of 'white goods' and furniture to supply goods in the first instance and will continue to signpost to those organisations. White goods from voluntary suppliers are all subject to a charge and some also charge a reduced amount for furniture.

A good network of contacts has been established for the provision of white goods and furniture. We will continue to work with the voluntary sector to provide assistance for people in need. This will help individual cases and provide people with information to signpost to alternative areas/agencies for support.

The cut would place a greater reliance on the voluntary sector for the provision of white goods and furniture. This would cause difficulties for people who are having to be housed and have no assets to move into new accommodation. This could have particular impacts on certain groups, such as people leaving institutions (eg, care or prison) or women fleeing domestic violence. The crisis element of the fund would be retained for emergency provision of food and assistance with utilities (gas and electricity).

Pregnancy

HIV/TB Support

The service is commissioned to provide support to people living with HIV and TB, who are either resident in Birmingham, or receiving their medical treatment in Birmingham, as well as those concerned about HIV/TB exposure. The service provides wider support activity such as advice, information, housing support and support with testing.

There will be an impact on the children of women (aged 0-1years), who are HIV+ and require access to free formula milk when there is NRPF. This is because there is still a risk of viral transfer through breast milk. Clarification is required regarding where the duty to provide this sits. The National Aids Trust recommends that all mothers living with HIV have access to free formula milk. The most appropriate body to do this would be the NHS (NAT, Access to Formula Milk briefing 2017). At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service. The views of subject matter experts will be sought.

RACE

Birmingham is a diverse city, with 42% of the population being from an ethnic minority background, reflecting the city's rich and varied cultural heritage. Birmingham is a "super-diverse" city. Academic research suggests that there are people from nearly 200 countries who have made Birmingham their home.¹. The 2011 Census revealed that 42.1% classified themselves within an ethnic group other than white British, compared to 30% in 2001, a rise of 12%. According to the 2011 census over 60% of the under 18 population is now from a

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TB is more prevalent amongst South East Asian and African communities. Access to services often requires support from translators because of language barriers. At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service. The views of subject matter experts will be sought.

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Reduction in Arts Grants by one third

This proposal relates to a one-third reduction in grant support to the major arts and cultural organisations and community programmes. The impacts on specific

organisations will be considered as part of the final budget approval following comprehensive impact assessments with individual organisations to ensure that their ability to become more self-sustaining is assessed.

These include:-. CBSO, Ex Cathedra, Symphony Hall, Town Hall, Birmingham Royal Ballet, Birmingham opera Company, Birmingham Repertory Theatre, Midlands Art Centre, Ikon Gallery, DanceXchange and Sampad. Community programmes include, Culture on your Doorstep, Black and Minority, Ethnic Arts Development and Neighbourhood Programmes.

The level of reduction has been assessed against the sector's ability to adapt and continue to operate. It is also proposed to maintain the 2019/20 level of funding for a four-year period to provide some stability and enable organisations plan their future programmes. We will work with the different organisations to help them to become self-sustaining where possible with the potential for the creation of "endowment funds". Ongoing monitoring and evaluation will mitigate any adverse impacts on all protected groups.

Reduction in translation costs at the corporate contact centre

The corporate contact centre has for a number of years used the services of an external translation company to manage their translation services. When an advisor is currently on a call where the citizen is struggling to communicate in English, there is a process where we dial an interpreter to join the call (this is managed via dial-in codes for each service/language). The most popular languages that we have required translation assistance for are as follows: Urdu, Bengali, Somali, Arabic, Romanian, Punjabi, Farsi (Persian), Tigrinya, Polish, Czech.

We are proposing to use staff from the Contact Centre – replacing the current external service – for callers struggling to communicate in English. We have staff who can speak the following languages: Hindi, Urdu, Punjabi, Bengali, French, Arabic, Portuguese, Polish, Spanish, Romanian, Mirpuri, Dutch, Somali, Swahili, Telugu and Tamil. This would result in a better service for citizens as the translation process can extend the length of the call and using internal translators would provide a more seamless experience.

We will still continue to use the services of the translation company as and when required as there are still some languages that we do not have the language skills. There will also be occasions where a citizen who has difficulty speaking English will not necessarily get through to a member of staff who speaks the language, therefore on these occasions we would also use an external translator.

Sexuality

Prejudice and discrimination based on sexual orientation and gender identity persist of LGBT people. Some may feel they have to conceal their sexual orientation for fear of a negative reaction. Belonging to a sexual minority remains a difficult experience for many people. The Proposals set out below can potentially impact LGBT service users/residents and we want to ensure there are no negative impacts of these proposals.

HIV/TB Support

The service is commissioned to provide support to people living with HIV and TB, who are either resident in Birmingham, or receiving their medical treatment in Birmingham, as well as those concerned about HIV/TB exposure. The service provides wider support activity such as advice, information, housing support and support with testing.

There are a high number of service users who choose not to disclose their sexual orientation. It is a well evidenced fact that one of the high risk groups is men who have sex with men, however, this does not show up in the reported data as individuals choose not to disclose this within the current service. At this stage it is expected that there will be confirmation of other support services available as an alternative to the current commissioned service. The views of subject matter experts will be sought.

Whilst the expectation is that the service will be decommissioned with minimal adverse impact on the eligible client group we have to engage with, and seek the views of a range of subject matter experts to ensure that adverse impact is not missed or misunderstood.

Religion and Belief

Sale of Polytainers and Certificates – Bereavement services

The option relates to Cremation services which are supplied by the Council to bereaved families. it is proposed to increase the core fee level which would now include the provision of containers for cremated remains, and a certificate for the collection of cremated remains. Approximately 65% of cremated remains are collected from the city's crematoria each year.

Families would no longer receive this service free of charge. A family removing cremated remains must have a certificate before removing them. We will charge £10 for this certificate. A person removing cremated remains will have the option to

purchase a polytainer for £10 or bring a container of their own choice for which there will be no charge.

This is an optional service for families and there is no adverse impact. However, the service will be monitor for any adverse impacts around affordability.

Transfer Management of Community Centres to a Third Party

Some Community Centres are directly managed by the council but most are already let (leased) to third sector and community groups who operate them for the benefit of the local community. The proposal is that other similar organisations become responsible for the day-to-day operation of Centres through charitable or not-forprofit means. They would also become responsible for the development of the site, and securing funds to invest in the facility in a way that the council is unable to.

The Centres would be occupied by a third party on a formal lease arrangement. The tenant would be required to continue operating the building as a community centre, offering access to activities and services for local residents.

This proposal involves transferring responsibility for running the Community Centre to a third party and it is not envisaged that there will any significant change in the short term. In the longer term an incoming tenant will be able to deliver the community development service that the council no longer funds, and access funding streams that are not available to the Council to provide the necessary investment in the building. It is possible that users with one or more of the protected characteristics will be impacted, and indeed some services that are provided specifically for groups of particular race, age, or disability may be withdrawn. However, because the proposal will see the Centre managed by an external organisation with access to their own resources, the result may equally be an expanded scale, scope and quality of services. We will complete a full EIA on each centre transferred to an third party to mitigate any adverse impacts. **This proposal has potential equality impacts across all protected characteristics**.

Potential Impacts of Budget Proposals by Protected Characteristic

EIA No.	Budget proposal	Age	Sex	Disability	Sexual Orientation	Marriage & Civil partnership	Pregnancy & Maternity	Race	Religion & Belief	Gender reassignment
EQUA157	AD101A 19+ Funding of Equipment Loan Store	Х		x						
EQUA165	Financial Assessment for Care & Support	Х		x			х	x	Х	
EQUA86	To reduce the amount of books purchased for the Library Service	Х		x						
EQUA133	Channel shift call reduction	х		х				х		
EQUA155	AD103 19+ HIV/TB Support	х		x	х		x	х		
EQUA170	Energy Savings from Highways Assets	Х		x						
EQUA200	Contract Management Savings Opportunities	х		×				х		
EQUA9	Legal Entitlement & Advice Service (LEAS)	Х		x						
EQUA132	Pest Control (partial cost recovery for domestic rat treatments)	Х		x				Х		
EQUA135	Cease handling Garden Waste payment calls at corporate contact centre	X		X				x		
EQUA168	Education infrastructure	x		x						
EQUA166	CY104 19+ Education Safeguarding	Х								
EQUA167	School & Governor Support	х								
EQUA162	Thematic areas - Building & Property	Х		X				х		
EQUA164	Children's Trust	x		Х				х		
EQUA190	Travel Assist	х		Х						
EQUA154	Reduce Local Welfare Provision	х	х	Х	Х			Х		

	funding									
EQUA159	Employment and Skills Cross Directorate Rationalisation	Х		x				x		
EQUA170	Energy Savings from Highways Assets	Х		X						
EQUA 90	Withdrawal of Funding from School Crossing Patrols	Х		X				x		
EQUA165	Bharosa	х	х	X	х			Х	х	
EQUA112	Sale of Polytainers and Certificates Bereavement services								Х	
EQUA160	Operational Hub Programme	х	х	х	x	х	x	х	х	Х
EQUA92	Transfer Management of Community Centres to a Third Party	Х	x	x	X		x	X	x	Х
EQUA169	Fees and Charges	х	х	X	x	х	X	Х	х	Х
EQUA193	Fees and Charges Review – Parks	Х		Х				Х		
EQUA192	Reduction in translation costs at the corporate contact centre	X	X					Х		
EQUA101	Reduction in Arts Grants by one third	x	х	x	x			х		
EQUA197	Consolidation Project – Transport Work stream									
EQUA93	Housing Options, PRS, Voids Redesign	x	х	x	x	х	x	х	х	Х
EQUA95	Social Lettings Agency and other PRS Incentives	Х	x	x	x	х	x	х	Х	Х

Proposal in early stages of development

Housing Options, PRS, Voids Redesign (PL123 19+)

The proposed service amalgamation and redesign is being submitted as an outline business case at this stage. The proposal to merge various functions across the service will directly impact staff/ employees and will indirectly impact our customers. The impact on customers will not be negative and the business case sets out the argument that the customer will benefit from improved flow, reduced duplication and abolition of silo working amongst connected services.

No discriminatory impact has been identified at this stage for any groups either within the employee base or customer/ citizen base.

This analysis is undertaken at an initial stage and based on limited information, as the proposal remains in the early stages of development. From the information available there is no clear need for a full Equality Analysis to be undertaken as there is no identified potential for negative impact to any person based on a protected characteristic. For customers, of the impacts that are identified, these appear to be positive at this time.

As the proposal develops this EA will require review to determine if it is still relevant, to update it as necessary and to determine if a full EA becomes necessary

Social Lettings Agency and other PRS Incentives (PL122 19+)

The proposed development of a wholly owned company delivering a Social Lettings Agency is being submitted as an outline business case at this stage. This is unlikely to directly impact staff/employees and will indirectly impact our customers. The impact on customers will not be negative and the business case sets out the argument that the customer will benefit from additional affordable housing opportunities in the city and improved support for both landlords and tenants.

No discriminatory impact has been identified at this stage for any groups within customer/ citizen base.

This analysis is undertaken at an initial stage and based on limited information, as the proposal remains in the early stages of development.

From the information available there is no clear need for a full Equality Analysis to be undertaken as there is no identified potential for negative impact to any person based on a protected characteristic.

For customers, of the impacts that are identified, these appear to be positive at this time.

As the proposal develops, this EA will require review to determine if it is still relevant, to update it as necessary and to determine if a full EA becomes necessary.