

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Date

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

What is an Equality Analysis (EA)? [Double click here for more information / Hide](#)

How to demonstrate compliance [Double click here for more information / Hide](#)

Deciding what needs to be assessed [Double click here for more information / Hide](#)

Role of the assessor [Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA) [Double click here for more information / Hide](#)

The Proposal *Click and hover over the questions to find more details on what is required*

Assessor name: Amy Carter

Contact details: Amy.Carter@cityoflondon.gov.uk / 0207 332 1653

1. What is the Proposal?

The proposal is to review our existing Complaints Policy. The document was last reviewed in 2015 and is subject to a 2-year review cycle.

2. What are the recommendations?

There is no substantial change to the policy. It remains a 3-stage process, in accordance with regulatory guidance. Some minor changes have been made, for examples an exceptions clause has now been added which allows us to respond to individual circumstances where necessary.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

Our residents and service users, and those acting on their behalf are predominantly affected by the proposals. On occasion, members of the public may approach us with concerns and it may be appropriate to use this policy to manage those concerns.

Age *Double click here to add impact / Hide*

Check box if NOT applicable

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

Double click here to show borough wide statistics / hide statistics

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The policy has a positive impact in relation to Age. To ensure we are being inclusive,

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Positive impact, no further change required.

Age

we do not require complaints to be made in writing, we accept complaints via any medium, including verbal, telephone, email and letter. If a complainant wishes to raise a complaint in person or by telephone, we will take a record of the complaint, and ensure they are happy it is an accurate record.

Disability [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London's population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has a positive impact in relation to Disability, as we do not insist that complaints are made by individuals themselves, a resident or service user may ask someone to act on their behalf. Furthermore, we do not require complaints to be made in writing, we accept complaints via any medium, including verbal, telephone, email and letter. If a complainant wishes to raise a complaint in person or by telephone, we will take a record of the complaint, and ensure they are happy it is an accurate record.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Positive impact, no further change required.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Pregnancy and Maternity.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Race [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City’s social housing residents is currently being refreshed. New data will be available in 2017/18.

Race	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has no impact in relation to Race.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>N/A.</p>

Religion or Belief [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics – sources include: The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity. Religion in England and Wales provides a summary of the Census 2011 by ward level</p>	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
--	---

[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief	
<p>Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals</p> <p>The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.</p>	
<p>What is the proposal's impact on the equalities aims? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</p> <p>The policy has no impact in relation to Religion or Belief.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>N/A.</p>

Sex [Double click here to add impact / Hide](#) Check box if NOT applicable

<p>Key borough statistics: At the time of the 2011 Census the usual resident population of the City of London could be broken up into:</p> <ul style="list-style-type: none"> • 4,091 males (55.5%) • 3,284 females (44.5%) 	<p>A number of demographics and projections for demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>
--	--

[Double click here to show borough wide statistics / hide statistics](#)

Sex

Sex

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Sex.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics – suggested sources include:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The policy has no impact in relation to Sexual Orientation or Gender Reassignment.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Marriage and Civil Partnership [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics - sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

Marriage and Civil Partnership

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The policy has no impact in relation to Marriage and Civil Partnership.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

N/A.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

The data held on the City's social housing residents is currently being refreshed. New data will be available in 2017/18.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

To continue to foster good relations, the City records all complaints and manages and monitors them through the same process. Whilst the policy has only positive impacts, we ensure we monitor the content and nature of complaints and remain alert for potential discrimination. For example, should multiple complaints be raised about a particular issue or by a particular group of residents we would ensure further investigation was carried out.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

The previous policy had no potential for discretion. In the new policy, in accordance with good practice, a clause has been added to enable variations to the policy in exceptional circumstances. This allows us to respond to individual circumstances when they arise.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

The policy approach is proportionate. There are only two variations which impact upon a protected characteristic and they are positive impacts. The reviewed policy also includes a clause enabling the City to use discretion where circumstances warrant it to adapt to meet individual circumstances.

Outcome of analysis - *check the one that applies*

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty 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.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

Name:

Date:

