

EQUALITY ANALYSIS (EA) TEMPLATE

What is the Public Sec

What is an Equality Ar

Decision

Approved

Date

04/07/18

How to demonstrate c

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

The following questions can help determine relevance to equality:

- Does the policy affect service users, employees or the wider community, including City businesses?
- How many people are affected and how significant is the impact on them?
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set?

Consider:

- How the aims of the policy relate to equality.
- Which aspects of the policy are most relevant to equality?
- Aims of the general equality duty and which protected characteristics the policy is most relevant to

If it is not clear if a policy or decision needs to be assessed through an equality analysis, a Test of Relevance screening tool has been designed to assist officers in determining whether or not a policy or decision will benefit from a full equality analysis.

Completing the Test of Relevance screening also provides a formal record of decision making and reasoning. It should be noted that the PSED continues up to and after the final decision is taken and so any Test of Relevance and/or full Equality Analysis should be reviewed and evidenced again if there is a change in strategy or decision.

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](#)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage - gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.2 Analyse the evidence - make an assessment of the impact or effects on different equality groups;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis - include the findings from the EA in your report or add as an appendix including the action plan;

2.5. Monitor and review – monitor the delivery of the action plan & ensure that changes arising from the assessment are implemented.

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

Assessor name: Liam Gillespie

Contact details: liam.gillespie@cityoflondon.gov.uk – 020 7332 3308

1. What is the Proposal?

The proposal is to implement an Anti-Social Behaviour Policy to outline how we the City of London's Housing Service will manage cases of anti-social behaviour occurring on its estates

2. What are the recommendations?

To approve the draft Policy

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

All residents of the City's Housing Revenue Account ("HRA") estates, across all locations; also City staff, agents and contractors; members of the public (for instance visitors to our estates)

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***

There is no impact in relation to Age.

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

N/A

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 2018/19.

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***

In many cases of anti-social behaviour, either the perpetrator or complainant, or both, will have support needs. These may or may not amount to a disability under the Equalities Act 2010, though they frequently do. Some support needs/disabilities may result in residents behaving in a manner that has a negative impact on their neighbours to some degree. Some disabilities may mean that a resident is less able to comply with certain conditions of their tenancy, or they may be less tolerant of certain behaviours displayed by others living close to them.

It is conceivable that these individuals will be more likely to be subject to the interventions described in this Policy.

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

There is an express commitment in the Policy to providing extra support to vulnerable residents to help them sustain their tenancies. We acknowledge in the Policy that anti-social behaviour may be caused by a person's health condition or disability. We will seek to provide, or arrange, support in these cases in the first instance, with a view to reducing or stopping the behaviour in question and sustaining the individual's tenancy. We accept that changes may be gradual.

The Policy encourages officers to take account of individual circumstances when making decisions. Training on handling anti-social behaviour cases appropriately will be provided to officers and this will include dealing with cases involving vulnerable people.

Prior to taking formal action under the Policy, we will carry out a proportionality assessment, which will address any disabilities the perpetrator has and the link between the disability and the behaviour. This assessment will be reviewed by a senior officer. This will explain the steps taken to date and will ensure that the impact of any disability is expressly considered prior to important decisions being made in the case.

Disability

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

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.

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 Race.

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

N/A.

Religion or Belief [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☒

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](#)

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](#)

Religion or Belief

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 Religion or Belief.

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

N/A.

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

[Check box if NOT applicable](#) ☒

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

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](#)

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 2018/19.

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

N/A

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.

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 is only one potential indirect impact upon a protected characteristic. This is mitigated by including clauses enabling officers to use discretion, where circumstances warrant it, to adapt to meet individual circumstances. There is also an express commitment to providing support to vulnerable residents to help them meet the obligations placed on them in their tenancy agreements.

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: Jacquie Campbell

Date: 4/7/18

