

EQUALITY ANALYSIS (EA) TEMPLATE

Decision*Adjustments to remove barriers identified by the assessment or to better advance equality*

12 April 2019

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: William Coomber

Contact details: William.coomber@cityoflondon.gov.uk

1. What is the Proposal?

A City Corporation Gender Identity (GI) Policy

2. What are the recommendations?

That the GI Policy will support the City Corporation to deliver its duties under the Equality Act 2010 effectively.

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

The proposal will directly affect transgender City residents, workers and visitors (including those in transition). There will be an indirect impact for other service users, particularly those who use single sex facilities and services.

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

[Check box if NOT applicable](#)

Key Demographic statistics:

The Square Mile has proportionately more residents aged 25-69 than Greater London and fewer young people. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

The City resident population is projected to grow steadily, with greatest growth amongst the over 65 years group over the next decade.

Those under 18 and over 65 years are concentrated in areas of deprivation in the east and north of the City.

City Workers tend to be younger, aged between 20-50 years of age. The younger age profile is consistent with the findings of prior independent reports and reflects the fact that finance and insurance industries represent a large % of the City workforce.

Demographics projections and analysis 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.

Age

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

There is no reliable data currently available on gender identity by age for residents, workers or visitors in the City of London. Some young people identify with a gender other than that assigned to them at birth.

What is the proposal's impact on the equalities aims?

The GI Policy does not have a disproportionate impact on a particular age group.

The GI Policy will not apply to schools who will develop their own policies.

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

N/A

Key demographic 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](#).

City workers tend to be healthier than the general population and this is largely due to their younger age profile, although lifestyle choices (such as drinking, smoking and diet) may have a negative impact.

The 2011 Census identified that for the City of London’s resident 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](#)

Disability and health inequality amongst residents tends to be geographically concentrated in pockets of deprivation such as Portsoken in the east and north of the City.

NB: These statistics provide general data for these protected characteristics.

Disability

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

There is no reliable data currently available on gender identity and disability for residents, workers or visitors in the City of London.

Some disabled people may identify with a gender other than that assigned to them at birth.

Research shows that trans people are more likely than the general population to experience mental health issues. The disability provisions under the Equality Act 2010 protect those with a ‘physical or mental impairment which has a substantial and long-term adverse effect on ... ability to carry out normal day-to-day activities.’

What is the proposal’s impact on the equalities aims?

The GI Policy may have a positive affect on the mental health of trans people, because it improves access to services and facilities and contributes to tackling stigma and discrimination.

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

Implement the GI policy and make sure that disabled trans people are aware of the policy and can access services/facilities.

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.

[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 GI Policy is not expected to impact pregnancy and maternity.

What is the proposal's impact on the equalities aims?

No impact.

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

Not applicable.

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

Check box if NOT applicable

Key demographic statistics:

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

The second largest ethnic group amongst residents is Asian (12.7%), this group is divided between Asian-Indian (2.9%), Asian-Bangladeshi (3.1%), Asian-Chinese (3.6%) and Asian-Other (2.9%). The City has the highest % of Chinese people of any authority in London and the second highest in England & Wales.

These Asian communities tend to be concentrated geographically in the east and north of the City.

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

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%.

City workers are largely white (79%), compared to Asian ethnicity (12%), black groups (5%), mixed race (3%) and Arab origins (1%).

NB: These statistics provide general data for these protected characteristics.

Race

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

There is no reliable data currently available on gender identity by race for residents, workers or visitors in the City of London.

What is the proposal's impact on the equalities aims?

No direct impact on race or ethnicity.

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

Develop a better understanding of the potential impact of multiple levels of discrimination and mitigation to address these.

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

Check box if NOT applicable

Key demographic 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](#)

The City is a religiously diverse area, with a wider range of religious/faith identities than England as a whole. In the City, 45.3% of residents identify as Christian, with 34.2% stating that they have no religion. The next largest group is Islam (5.5%), followed by Judaism (2.3%), Hindus (2%), Buddhists (1.2%) and Sikhs (0.2%).

Since 2011 the Christian population has fallen by approximately 10% and those with no religion risen by roughly the same figure.

NB: These statistics provide general data for these protected characteristics.

Religion or Belief

Additional Equalities Data (Service level or Corporate)

There is no reliable data currently available on gender identity and religion or belief for residents, workers or visitors in the City of London.

The GI Policy may challenge beliefs about single sex services and facilities in some religious communities. The GI Policy could therefore have a challenging impact on the use of services and facilities by members of those communities.

What is the proposal's impact on the equalities aims?

The proposal is consistent with the Equality Act 2010 provisions on religion and belief.

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

Religious worship is exempt from the provisions of the Equality Act 2010.

The Public Sector Equality Duty includes a responsibility to 'foster good relations between people who share a relevant protected characteristics and persons who do not share it', and the City may want to consider what opportunities the GI Policy creates for dialogue with and between different communities.

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

[Check box if NOT applicable](#)

Key demographic 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.

Sex

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

Some males and females who use single-sex facilities have concerns about and/or are uncomfortable with trans access to those facilities (as illustrated by some of the responses to the City Corporation's GI Survey).

What is the proposal's impact on the equalities aims?

Sex is a protected characteristic under the Equality Act 2010.

The Act also has a strong inclusive presumption for trans people with respect to single sex services and facilities.

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

The City Corporation should consider exclusion of trans people from single-sex services in exceptional circumstances where this is a proportionate means to a legitimate end.

The Public Sector Equality Duty includes a responsibility to 'foster good relations between people who share a relevant protected characteristics and persons who do not share it', and the City may want to consider what opportunities the GI Policy creates for dialogue with and between different groups in the community.

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

Check box if NOT applicable

Key demographic statistics:

It is estimated that 10% of the UK population belong to the lesbian, gay and bisexual communities in the UK. Stonewall have estimated that 1% of the UK population are Transgender or identify as non-binary or gender fluid.

Please refer to:

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

NB: These statistics provide general data for these protected characteristics.

Sexual Orientation and Gender Reassignment

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

There is currently no reliable data on the numbers of transgender people living, working or visiting the City of London.

The GI policy was strongly supported by trans respondents to the GI Survey.

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 GI policy will have a positive impact on transgender inclusion, and for LGBTQ

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

As it implements the policy, the City Corporation may have opportunities to

Sexual Orientation and Gender Reassignment

rights (noting that this is a diverse community, and includes people who do not support the policy, as was reflected in a minority of responses to the GI Survey).

The policy highlights the challenges for public authorities of responding to new understandings of and expectations about gender, with implications for the Public Sector Equality Duty. For example, how people who identify themselves as ‘non-binary’ or ‘gender fluid’ are covered by a gender identity policy.

promote dialogue between Trans, LGBT and Women’s groups, which would be beneficial in fostering good relationships.

It would be beneficial to have more data on gender identity in the City, while recognising the challenges of monitoring on a trans classification.

There are legal limits to the degree to which people who identify as non-binary or gender fluid can be covered by this policy. However, the policy can commit to do whatever is possible (within the current limits of the law) to address issues for people who identify as non-binary/gender fluid as a matter of policy.

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.

[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*

There were no obvious impacts upon marriage and civil partnership arising from the proposed draft policy.

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***

No negative impact

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

Non-applicable

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)

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

No

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.

Non-applicable

Conclusion and Reporting Guidance

This analysis has concluded that...

The proposed policy provides a statement of the City Corporation’s Public Sector Equality Duty under with the Equality Act 2010 with respect to Gender Assignment.

The City should also consider what opportunities the launch and implementation of a Gender Identity Policy creates for fostering understanding, dialogue and good relations between different equality groups.

The GI policy is an important tool in delivering the Equality Act 2010 and Chief Officers should draw up plans to promote trans equality in their service areas, with impact monitored and appropriate accountability and governance. Monitoring should also look out for evidence of any negative impact on service use by other protected groups.

There is little data on gender identity and how it intersects with other protected characteristics. It would be beneficial to build this evidence base where practicable.

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.

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:	Andrew Carter	Date:	12.04.2019
--------------------------------	--	--------------	---------------	--------------	------------