Report of the Assistant Director, Office of the Chief Executive to the meeting of Executive to be held on 7 February 2017.

BA

Subject:

Consultation feedback and equality assessments for the 2017-18 and 2018-19 Council budget proposals.

Summary statement:

On 6 December 2016 the Executive approved new budget proposals for consultation as required with the public, interested parties, staff and the Trade Unions. This report and appendices provide feedback from the public engagement and consultation programme and sets out a summary of the equality assessments carried out on the Executive's Budget proposals for 2017-18 and 2018-19. There is particular reference to the Council's responsibilities under equality legislation to enable the Executive to have due regard to the Public Sector Equality Duty when considering its recommendations to Council on a budget for 2017-18 and 2018-19.

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SUMMARY

1.1 On 6 December 2016 the Executive approved new budget proposals for consultation as required with the public, interested parties, staff and the Trade Unions. This report and appendices provide feedback from the public engagement and consultation programme and sets out a summary of the equality assessments carried out on the Executive's Budget proposals for 2017-18 and 2018-19. There is particular reference to the Council's responsibilities under equality legislation, to enable the Executive to have due regard to the Public Sector Equality Duty when considering its recommendations to Council on a budget for 2017-18 and 2018-19

BACKGROUND

2. Best Value and the Equality Act

- 2.1 Statutory guidance on Best Value introduced in September 2011 and reaffirmed in March 2015 reminds local authorities that they are under a duty to consult service users and potential service users, local voluntary and community organisations, and small businesses. This duty applies at all stages of the commissioning cycle, including whenever authorities are considering the decommissioning of services.
- 2.2 There should also be opportunities for organisations, service users and the wider community to put forward options on how to reshape the service or project. Local authorities should assist this engagement by making available all appropriate information in line with the Government's transparency agenda.
- 2.3 The Equality Act 2010 protects people from unlawful discrimination on the basis of 'protected characteristics'. The Equality Act 2010 defines protected characteristics as:age; disability; gender reassignment; pregnancy and maternity; marriage and civil partnership; race; religion or belief; sex; and sexual orientation.
- 2.4 The 2010 Act also introduced a specific Public Sector Equality Duty which requires local authorities, in the exercise of their functions, including when making decisions, to have *due regard* to the need to:
 - eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
 - foster good relations between people who share a protected characteristic and people who do not share it.
- 2.5 In discharging this duty, local authorities not only need to understand how different people will be affected by their activities, proposals and decisions, they also need to demonstrate that they have given due regard by publishing information that shows they have consciously discharged their responsibilities as part of the decision-making process.

- 2.6 In January 2013 the Equality and Human Rights Commission (EHRC) published Technical Guidance on the Public Sector Equality Duty to assist the bodies that are subject to the duty, to understand the duty and meet their responsibilities. This notes that a public body will only be able to comply with the general equality duty in relation to a decision, if the ultimate decision maker:
 - understands the body's obligations under the general equality duty.
 - has sufficient information.
 - demonstrably takes this information fully into account throughout the decisionmaking process.
- 2.7 The EHRC emphasises the importance of ensuring that the duty is complied with before a decision is taken, while options are being developed and appraised, as well as at the time of the actual decision. The duty cannot be used retrospectively to justify a decision.

OTHER CONSIDERATIONS

3. Supporting the 2017-18 and 2018-19 Budget Setting Process

- 3.1 The public engagement and consultation programme in relation to the budget proposals for 2017-18 and 2018-19 was agreed by the Executive at its meeting on 6 December 2016. At the meeting the Executive reaffirmed its commitment to a public engagement and consultation programme designed to meet the legislative duties and to fulfil the following objectives:
 - support the 2017-18 and 2018-19 budget setting process in as fair and as transparent a way as possible.
 - ensure that the Council meets its specific duties under equality legislation, in particular that the potential impact of the proposals on groups or individuals who share protected characteristics are considered, assessed and consulted upon as required. This would also be extended to those include on low income/low wage.
 - ensure that Trade Unions and staff are consulted with appropriately and in a timely manner.
 - meet Best Value Statutory Guidance regarding the way local authorities should work with Voluntary and Community Sector (VCS) organisations and small businesses when facing difficult funding decisions.
 - comply with the principles on consulting and engaging with the VCS contained in Bradford District Partnership's Compact.
 - ensure the Council complies with all other legal duties to consult.
- 3.2 While the Council is not required under statute to produce or publish equality impact assessment (EIA) forms specifically, a local decision has previously been taken to continue to use EIA forms. Equality impacts are considered by officers and elected members as part of the development of the budget proposals, with assessments recorded through an EIA form. The forms can then assist members of the public and other interested parties to view potential equality impacts. This will show where a disproportionate impact has been identified, or where an impact affects a number of people or particularly vulnerable groups. Mitigations will have also been considered, and where these have been possible, they have also been captured on the EIA form.

- 3.3 Case law has confirmed that in order to fulfil the duty under S149 of the Equality Act 2010, Elected Members need to have considered equality impacts and given due regard to the three aims of the equality duty as part of their decision making processes.
- 3.4 EIA forms outlining identified equality impacts on the new budget proposals agreed by the Executive at their meeting on 6 December 2016 have been available on the Council's web site since that time. <u>https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2017-18/</u>
- 3.5 Following a review and assessment of the consultation feedback EIA forms will be updated then published at the same time as the papers for the Executive meeting on 21 February 2017. Senior Officers and Portfolio Holders will continue to give due regard to the equality impacts identified in the EIA forms throughout the budget setting and longer term implementation process.

4. Cumulative Equality Impacts on the 2017-18 and 2018-19 Budget Proposals

- 4.1 An analysis of the equality assessments was undertaken to identify any cumulative impacts and/or high levels of impact across all the proposals agreed at the Executive meeting on 6 December 2016. This analysis was shared with Executive members at the time. Detail of the analysis is described below, alongside the summary presented at Appendix 1.
- 4.2 A review of all equality impact assessments demonstrates that some proposals are more likely to impact on some people than others; and that certain protected characteristic groups will also be impacted more greatly than others. The equality assessments will continue to be reviewed as the proposals are consulted upon, potentially changed, agreed and then implemented.
- 4.3 Individual proposals affecting a number of protected characteristic groups include the following.
 - A Prepared and Skilled Workforce (4C3)
 - WYCA Transport Levy Reduction (4R2)
 - Drainage, Pavements, Footpaths (4R6)
 - Gateways, Subway, Signing, Lining, Winter Gritting (4R7)
 - Public Health Services for Children 0-19 (4PH1)
 - Sexual Health (4PH3)
 - Homestart (4PH5 part a)
 - Injury Minimisation Programme (4PH5 part b)
 - Worksafe (4PH5 part c)
 - Physical Activity, Food and Nutrition (4PH6)
 - Warm Homes Healthy People (4PH8)
- 4.4 The protected characteristic of age is very high for both young people and older people. This is seen primarily through Public Health and Adults and Community Services (Better Health, Better Lives) proposals which will have a high impact on a smaller number of people, and Better Skills, Jobs, Economy which will affect a large number of people. 25 of the 31 proposals show impacts.

Likewise for disability, there are fewer proposals showing high impact, but still 24 showing impact across all proposals, with the areas of most concern being public realm management, adults demand management reductions and Public Health's funding of warm homes and injury minimisation programmes.

- 4.5 It is also acknowledged that any early intervention funding reductions across public health proposals might have a further knock on effect on some protected characteristic groups who may then have a greater dependency on health and social care services.
- 4.6 Again across all proposals 25 show impacts on people with low income and low wage. Most high impacts will be felt through the range of Public Health proposals in Better Health, Better Lives.
- 4.7 Another protected characteristic being affected by a larger number of proposals, 19 in total, is race through a possible cessation of provision of early intervention measures from Public Health and potential additional costs of burials.
- 4.8 Pregnancy/maternity also features with proposals supporting the health and wellbeing of mothers of young children (e.g. Homestart and sexual health). Public realm proposals also impact with maintenance of highways (pregnant women, mothers with pushchairs) and also the reduction in public conveniences.
- 4.9 Other protected characteristic groups have lesser impacts than those highlighted above, but are still likely to feel the affects of some of the proposals. For example, the Better Health, Better Lives proposal around sexual health will impact on sexual orientation. An element of the substance misuse proposal will also impact on the sexual orientation protected characteristic. Alongside pregnancy and maternity, women (sex) will also be impacted by proposals by potentially less sexual health support and Homestart support.
- 4.10 Two proposals currently show no impacts (4PH2b Provision of Inpatient detoxification for Substance Misusers and 4PH4 Tobacco). This is due to information not yet being available on the particular individuals that are likely to be affected (i.e. who they are, and therefore their protected characteristics). However the individuals to be affected are likely to be vulnerable people, meaning an assessment was felt to be appropriate. If these proposals are confirmed, more detail will be sought as the proposal is implemented.

5. Consultation Process

- 5.1 The consultation programme for the budget proposals for 2017-18 and 2018-19 is part of an open, on going conversation between the Council and citizens, VCS, businesses, Council employees and trade unions about the future of local services.
- 5.2 The documentation shared for the consultation programme covers three areas of savings which include:
 - Savings consulted upon during 2015-16 and agreed by Full Council on 25 February 2016. These are provided for information and context and are not part of this consultation process.

- Savings consulted upon during 2015-16 and agreed by Full Council on 25 February 2016 but that have since been amended. These proposals are open for consultation.
- New proposals open for consultation until 12 February 2017.
- 5.3 The consultation programme opened with the publication of the report the 'Executive Budget and Council Tax Proposals 2017-18 and 2018-19' on 30 November 2016 which the Executive approved for consultation on 6 December 2016.
- 5.4 The consultation and engagement programme has included the following activities:
 - Open public consultation via the website and via a freepost address.
 - Regular posts promoting the consultation through the Council's corporate social media accounts (several each week) and Stay Connected e-mail newsletters for residents.
 - Meetings with community of interest groups centred on the protected characteristics as set out in the Equality Act and also with low income groups. These were undertaken with disability groups, older people groups, EU migrants, the Advice Network, Gypsies and Travellers, Equity Partnership, COEMO run event for local Black Minority Ethnic Groups, Adult Service User Involvement Group and refugee and asylum seekers.
 - Direct promotion of the consultation to groups not wishing to attend dedicated sessions including the Women's Forum, Race and Ethnicity group, Carers Network and Looked After Children.
 - Meetings with the Bradford District Partnership's Strategic Delivery Partnerships.
 - Dedicated consultation session with the Voluntary and Community Sector through the Bradford District Assembly.
 - Meetings with the business community Bradford Breakthrough, Keighley Business Improvement District Board, Airedale Partnership Board, People and Innovation Board, Place Board.
 - Direct communications with Members of Parliament, Parish and Town Councils and the district's Citizens Panel.
 - Service specific consultations including consultation events at six community halls across the district (with invitations sent directly to groups using the halls).
- 5.5 Engagement and consultation is an on going process and there will be further specific consultation with service users and other interested parties on specific proposals as appropriate following the approval of the budget for 2017-18 and 2018-19 at the Council meeting on 23 February 2017.

6. Consultation Feedback - Level of Responses

6.1 This report provides information on feedback received at the date of publication of this report on 30 January 2017. Any feedback received after this date and before the consultation closes on 12 February 2017 will be provided as an addendum to the Executive meeting on 7 February 2017 or its later meeting on 21 February 2017.

- 6.2 As of 25 January 2017 the Council has received comments from 501 people or groups through the online questionnaire. This produced comments on 536 different budget proposals for 2017/18 and 2018/19. A further 123 comments are made that are not specific to particular proposals for the next two years. The number of overall comments is similar to past consultations on the Council's budget.
- 6.3 A further 72 postal questionnaires were received, and 12 representations through emails or letters.
- 6.4 Monitoring of the corporate social media accounts and Stay Connected newsletters on the budget consultation has, to date, shown 27 opinions from residents which have been passed on to be included in the overall consultation feedback and over 1,000 click-throughs to the online consultation pages. Overall activity on the corporate social media accounts around the consultation was far greater than that in terms of reach and posts shared, and not all responses represented feedback on the overall budget proposals or an individual proposal.
- 6.5 It is worth noting that even though the volume of responses is reported, this does not necessarily suggest that greater attention is given to those with a greater number of responses. It does not allow for those people who are less able to advocate for themselves and does not reflect on the Council's statutory duties around particular areas of service provision.
- 6.6 However the proposals generating most comments were:
 - Theatres and Community Halls (4E10) with most comments focusing on community halls 161
 - Parks and Bereavement (4E1) with most comments on bowling greens 127
 - Street Cleansing and Public Conveniences (4E5) with most comments on the public conveniences 90
 - Physical Activity, Food and Nutrition (4PH6) with most comments focusing on the breastfeeding programme in Keighley 63
 - Council Tax 31
 - Adults, Overall Demand Management Strategy (4A1) 29
 - Ministry of Food (4E12) 22
 - Small Grants (VCS funding) (4PH7) 19
- 6.7 Other proposals that are generating between five to ten comments are Libraries (4E9), Waste Collection Disposal Service (4E2), Highways maintenance (4R6), A Prepared and Skilled Workforce (4C3), Remodel of Visitor Information and Frontline Service (4E7), and Homestart/ Worksafe/ Injury Minimisation (4PH5). A further 11 proposals received between one and five comments.
- 6.8 Levels of attendance at Community of Interest meetings has varied according to the style of the session, from business meetings to dedicated events. As of 25 January 2017 we have engaged with 129 individual people through disability groups, older people groups, EU migrants, Gypsies and Travellers, Adult Service User Involvement Group, the Advice Network and Refugee and Asylum Seekers. Further sessions are yet to be held with the Equity Partnership and a COEMO run event for local Black Minority Ethnic Groups. Feedback received to date has been integrated into this report with outstanding feedback to follow later in further reports on the consultation.

- 6.9 Service specific consultations have generated further input. The consultation on public halls has led to engagement with 270 people through six events.
- 6.10 Two petitions have also been received in relation to the proposed budget proposal Theatres and Community Halls (4E10).
 - Ian Clough Hall this was referred to Executive from Council on 17 January 2017 lodging their objection to the proposal for Bradford Council to no longer take responsibility for Ian Clough Hall, Baildon. Accompanying information stated concern that the activities and events run from the hall would no longer be available to local communities, and that it would be too great a burden for the Town Council to take on with its current maintenance issues. It was felt that more action could have been taken to make the hall more marketable and increase its revenue potential. There were 535 signatures presented.
 - Silsden Town Hall this was received prior to the Executive meeting on 7 February 2017, from Friends of Silsden Town Hall and Silsden residents, requesting that Silsden Town Hall be removed from the list of Public Halls recommended for Community Asset Transfer. They state that the cost of the hall is almost cost neutral and that it should be included with Kings Hall, Ilkley for central costing. They also state that the it is a newly refurbished, iconic building, paid for by the sale of two other community buildings and is the only secular building in the town. They wish to work with the Council to explore funding opportunities to keep the hall under the same management structure as at present. There were 1311 signatures presented.

7. Consultation - Specific Feedback on Proposals

- 7.1 The following provides some of the headline comments made on both specific budget proposals for the next two years and also other areas of Bradford Council's work and consequent spending that are subject to review over the next four years. These comments have come through the online/postal questionnaire, social media, emails, letters and community of interest events and meetings.
- 7.2 Listed below are some of the feedback headlines on some of the budget proposals identified for the next two years (2017-18 and 2018-19). Further detail is presented in Appendix 2.
 - Community Halls (4E10) There is concern that the halls serve as community hubs; if closed the activities run and supported from there will have nowhere to be delivered. The halls provide a focal point for the communities and have received much support from local people in recent years.
 - Parks and Bereavement (4E1) the withdrawal of support for bowling greens was felt to be inappropriate due to the value they provide to communities and the technical nature of the maintenance work needed.
 - Public Conveniences (4E5) There is concern over possible closures; seen as a necessary service for many; supports tourism and local economy.
 - Physical Activity, Food and Nutrition (4PH6) The breastfeeding programme run from Keighley is felt to be a vital service that should be prioritised as a preventative activity.

- Adults Overall Demand Management Strategy (4A1) It is felt that support is still needed for disabled people and carers and that prevention and support services should be prioritised. Currently, supported living is available but it should have a greater focus on encouraging people to become independent. The focus on Homes First was supported so long as people are in appropriate homes they can maintain themselves.
- Ministry of Food (4E12) A preventative service that supports a lot of people with more than just food and nutrition advice.
- Small Grants (VCS funding) (4PH7) There is much support for the Healthy Lifestyles projects run through commissions to the VCS. It provides a vital service in a deprived part of the district, serving to prevent longer term health problems.
- 7.3 There were also a number of general comments relating to the budget but not linked to a specific proposal. It was felt that council tax should not be raised, as people were not getting value for money and people could not afford the additional costs. However others thought increases were necessary especially to support social care services. There were some suggestions that vulnerable people should continue to be supported while the cuts should be focused on people more able to look after themselves. This was in opposition to those who suggested that there should be less spending on social care. There was a feeling that education and schools should be improved and that there be a greater focus on community safety and reducing crime. There were also concerns over housing and homelessness with a greater focus on funding needed on these two areas. It was felt that housing standards need to improve and more opportunities be given to those who become homeless.
- 7.4 Running a more efficient Council in response to the Council's priority 'A Well Run Council' it was suggested that council staff and senior managers in particular should take a reduction in their salaries rather than cut services. Administration costs should also be reduced including running fewer formal committees. It was also suggested that the number of Councillors should also be reduced and Government funding also needs to be better utilised and accessed. It was felt that the government also needs challenging to make sure that the funds they provide are of value locally and that commissions could also be more effectively managed.
- 7.5 Concern was also raised at the reduced support for vulnerable people across the district from the reduction in Council services. Services need to remain accessible especially for those who do not read or write. There are also general concerns that with the withdrawal of some services, community buildings where those activities take place will also be at risk of closure (over and above Council run community and town halls) e.g. Café West, Keighley Healthy Living Centre. Further suggestions were to identify short term resources to help outlying areas of the district to increase community capacity to help cope with the funding reductions. It was also felt that consistency in funding for community services was necessary as projects are not efficient if the funding comes and goes.
- 7.6 Consultation has also taken place with the Voluntary and Community Sector with a dedicated engagement session taking place on 18 January 2017. More feedback will be presented at a later date in the consultation period. To date the following highlights some of the headline contributions from the sector;

- Many of the Public Health cuts do not take account of the drive towards developing an early help response and family approach.
- Prevention is key to cutting costs for other organisations such as Clinical Commissioning Groups and Children's Social Care Fund.
- Support for volunteers is vital to support preventative activities.
- Engaging further with the VCS at an early stage of service re-design would help to ensure that reductions in funding and changes in focus impact as little as possible on local people.
- There is concern about the reliance on community activity to take over services that the Council has delivered, but it appears some of the decisions will reduce the capacity for communities to do this.
- The proposals seem to suggest that there will be increased competition for donations and charitable income by the creation of new trusts.
- There is concern over the impact of cuts on other initiatives and organisations.
- 7.7 Consultation has also taken place with the businesses sector through attendance at various business meetings across the district. The feedback to date includes the following:
 - Suggestion that some of the Council's rationalisation, such as with property, should have taken place sooner. There was support for co-location opportunities especially within the public sector.
 - Suggestion that the cuts that are likely to get the highest profile should not be pursued as it takes the emphasis off the true impact of austerity with both communities and the media.
 - There was interest in whether a future directly elected mayor would change the Council's economic position.
 - Businesses were keen to see continued support for a baseline level of service for things like cleansing, street lighting, CCTV, policing i.e. the physical visible services that serve town centres. However there was acknowledgement of the financial situation and suggestion that projects such as Keighley Business Improvement District was a positive step which would continue to get support.

8. Feedback on services not subject to consultation

- 8.1 Some comments in the consultation were made on Council services which are not currently identified as budget proposals and about which decisions have already been made. This included comments on the district's swimming pools (10 comments received), with a suggestion that Bingley and Queensbury pools should not be closed or taken into community ownership even if new facilities are opened elsewhere in the district. There was concern that children would have no local facility where they could learn to swim. Disabled people and their carers use these facilities. Some people thought existing pools need more investment and modernisation, not closure and facilities such as pools should not be centralised as public transport is not efficient enough to support the travel needed at evenings and weekends.
- 8.2 Further comments were also made in relation to the decision to move to alternate weekly bin collections with concerns over fly tipping and environmental problems raised.

9. FINANCIAL & RESOURCE APPRAISAL

9.1 The financial impact of decisions arising from the consultation will be considered at the Executive meeting on 7 February 2017 and will be evaluated and incorporated into the final budget proposals from Executive to Council on 23 February 2017.

10. RISK MANAGEMENT AND GOVERNANCE ISSUES

10.1 Equality assessments have been carried out on the initial proposals and will continue to be updated alongside any mitigation.

11. LEGAL APPRAISAL

- 11.1 S149 of the Equality Act 2010 (the Public Sector Equality Duty) provides as follows :
 - (1) A public authority must, in the exercise of its functions have due regard to the need to;
 - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it
 - (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to;
 - a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
 - (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
 - (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to;
 - a) tackle prejudice, and
 - b) promote understanding.
 - (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

- 11.2 The Council must ensure that it has sufficient information to enable it to identify whether a proposal, if implemented, would disproportionately affect particular groups with relevant protected characteristics and if so whether any such adverse impact can be avoided or mitigated.
- 11.3 The courts have established a number of principles which the Council should take into account in making decisions:
 - the duty means that the potential impact of a decision on people with different protected characteristics must always be taken into account as a mandatory relevant consideration
 - where large numbers of vulnerable people, many of whom share a protected characteristic, are affected, consideration of the matters set out in the duty must be very high
 - even if the number of people affected by a particular decision may be small, the seriousness or the extent of discrimination may be great. The weight given to the aims of the duty is not necessarily less when the number of people affected is small.
- 11.4 There is also a duty on all Best Value authorities to consult when making changes to services or ending service provision.
- 11.5 In addition to these specific legal duties, the Council has put out its proposals for public consultation and accordingly must have regard to the responses before making budget decisions.
- 11.6 In summary it is necessary to ensure that Executive have comprehensive information when considering the recommendations to make to Council on a budget for 2017-18 and 18-19. Case law has confirmed that, in order to fulfil the duty under S149 Equality Act 2010, Elected Members need to read in full the EIA forms and consultation feedback as it is a legal requirement that Elected Members have regard to all the relevant information and accordingly Elected Members are referred to all the information in this report including appendices and to the equality assessments. https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2017-18/

12. OTHER IMPLICATIONS

12.1 EQUALITY & DIVERSITY

Where specific equality and diversity issues have been raised as a result of consultation, they are considered in the appendices of this report and through the equality impact assessment forms.

12.2 SUSTAINABILITY IMPLICATIONS

None

12.3 GREENHOUSE GAS EMISSIONS IMPACTS

None

12.4 COMMUNITY SAFETY IMPLICATIONS

The Council has a legal obligation under the Crime and Disorder Act 1998 to consider any community safety implications of its decisions.

12.5 HUMAN RIGHTS ACT

None

12.6 **TRADE UNION**

The Trade Union consultation feedback received to date on the proposals is subject to a separate report to this meeting of the Executive.

12.7 WARD IMPLICATIONS

At this stage the proposals suggest district wide impact and are not specific to particular wards. As implementation plans are developed for the delivery of any budget decisions following 23 February 2017, the detail of which wards will be affected will become apparent.

13. NOT FOR PUBLICATION DOCUMENTS

None

14. **RECOMMENDATIONS**

14.1 That in accordance with Section 149 of the Equality Act 2010, the Executive has regard to the information contained in this report, appendices and equality assessments when considering the recommendations to make to the Council on a budget for 2017-18 and 2018-19 on 23 February 2017.

15. APPENDICES

Appendix 1 - Equality Impacts for budget proposals (2017/18 and 2018/19) as agreed on 6 December 2016

Appendix 2 - Consultation feedback - service and equalities

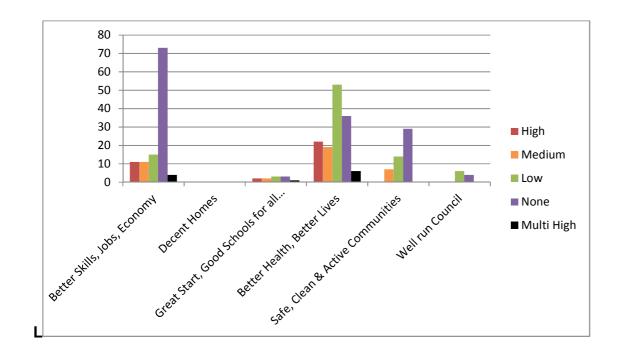
16. BACKGROUND DOCUMENTS

Report to Executive on 6 December 2016: Proposed Financial Plan 2017/18-2020/21 <u>https://bradford.moderngov.co.uk/ieListDocuments.aspx?CId=143&MId=6329&Ver=4</u> – document AJ with accompanying appendices

Equality Impact Assessments (for budget proposals 2017/18 and 2018/19) https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2017-18/ Appendix 1 - Equality Impacts for budget proposals (2017/18 and 2018/19), as agreed on 6 December 2016

					Multi
Theme	High	Medium	Low	None	High
Better Skills, Jobs,					
Economy	11	11	15	73	4
Decent Homes		No im	pacts ide	ntified	
Great Start, Good					
Schools for all					
Children	2	2	3	3	1
Better Health,					
Better Lives	22	19	53	36	6
Safe, Clean &					
Active Communities	0	7	14	29	0
Well run Council	0	0	6	4	0

1. Level of impact by outcome (priority)



2. Proposals with multiple high impacts

Theme	EIA Ref	EIA Heading	Age	Disability	Race	Pregnancy & Maternity	Sexual Orientation	Sex	Low income/low wage
	4C3	A prepared and skilled workforce	н	н	н	Н			н
Better Skills, Jobs,	4R2	WYCA Transport Levy reduction – Percentage annual reduction	Н	н					
Economy	4R6	Drainage, pavements, footpaths	н	н					
,	4R7	Accommodation, gateways, subway, signing, lining, winter gritting	н	Н					
Great Start, Good Schools for all Children	4PH1	Public Health - Services to Children 0-19	н						н
	4PH3	Sexual Health	н			Н	н	н	
	4PH5 Pt a	Homestart	н		H	н		H	Н
Better Health,	4PH5 Pt b	Injury Minimisation Programme (IMPs)	н		н				н
Better Lives	4PH5 Pt c	Worksafe	н	н	н				н
	4PH6	Physical Activity, Food and Nutrition (Health Improvement)			H				Н
	4PH8	Warm Homes Healthy People (WHHP)	Н	Н				н	н

	Impact Levels				
Protected Characteristic	High	Medium	Low	TOTAL	
Age	10	5	10	25	
Disability	6	9	9	24	
Gender reassignment	0	2	9	11	
Race	5	3	11	19	
Religion/belief	0	5	9	14	
Pregnancy/Maternity	3	5	9	17	
Sexual Orientation	1	1	8	10	
Sexual Orientation	3	4	7	14	
Marriage & Civil Partnership	0	0	6	6	
Low Income/Low Wage	7	5	13	25	

3. Total level of impacts across each protected characteristic group

Feedback from consultation contributors by proposal or budget area (Where proposals have received no comment through the consultation, these have not been included in the table below.)

Ref	Budget Proposal or	Equality Assessment	Mitigation	Feedback on service and	Outcome	
Rei	budget area:	As publishe	d in December 2016	equality impacts	Outcome	
4PH2	Substance Misuse Service - combination of redesign, re-commissioning and ceasing recovery service, dual diagnosis service, supervised medication programme, inpatient detoxification services.	Impact assessments have identified that this range of proposals could have impacts on a wide range of service users across the range of protected characteristics.	Any new contracts will continue to have the same equality requirements of the Provider under the Equality Act 2010 as the current tender. The new service specification being commissioned requires that the service is provided through various types of provision and that the service is integrated throughout providing continuity for service users. Services will be more community based with access points in multiple sites in non- substance misuse specific services making it easier for all sections of society to access them.	It was felt that reductions in this service would have a detrimental effect on health services and affect people's lives. It was suggested further conversation with CCGs was needed.	Better heath, better lives	
4PH3	Sexual Health - combination of redesign, review and ceasing services Health development with young people, sex and relationship education in schools, emergency hormonal contraception.	Some of the services are designed specifically for parts of the population who share a protected characteristic. Therefore services are provided disproportionately to those parts of the population and the impact will reflect this. The financial implications of this reduction in budget will be applied across the whole of the contract and therefore will impact upon all potential users of the services.	The SRHS that is commissioned is part of a wider Sexual Health economy with GPs providing oral contraception and STI testing which is commissioned by NHSE from GP practices as part of their core service offer. Bradford residents would still be able to access SHRS (oral contraceptives and STI screening) within their community through their GP practice and Long Acting Reversible Contraceptives (coils and implants) and STI testing and treatment, through the SHRS that would stay situated centrally within the city centre making it accessible to all.	These programmes help to reduce teenage pregnancy. Without this service there will be increased issues around unsafe sex, depression and issues for young mothers.	Better heath, better lives	
4PH5	Public Health - Homestart, Worksafe, Injury	Impact assessments have identified that this range of	Some activities may be mainstreamed into the wider	It was felt important for vulnerable children to hear safety messages	Better heath, better lives	

	Minimisation Programme - phase out of these services providing support for vulnerable parents and children age 0-5 years.	proposals could have impacts on a wide range of service users across the range of protected characteristics particularly age, disability, race and low income families. There will be impact on key public health outcomes which are likely to widen inequalities in some of our vulnerable groups as these services are delivered across the areas that have already been identified as a strategic priority within the District's Health Inequalities Action Plan.	transformation plan for children and young people and families in the District going forward but there will be some that will not be mitigated against. In order to manage any negative affects we will use a phased approach so that we can identify any potential risks in the first year. Some risk may be mitigated with funding from other areas within the District through Better Start and Big lottery in Keighley so the negative consequences are not as high as would be expected if the service was completely decommissioned.	from people of authority, beyond parents and teachers, which the Worksafe programme provides. It provides a valuable service to the young people of Holme Wood. The project helps children understand key safety issues around gas, electricity, fires, dogs and railway lines. It also ensures children can safely get to school independently.	
4PH6	Physical Activity, Food and Nutrition - cessation of grants to VCS organisations delivery range of activities including 'cook and eat', physical activity, food growing and breastfeeding support.	Services are currently commissioned from a variety of BME organisations and groups based in low income areas to ensure positive outcomes for all parts of the community. The race equality impact is judged to be high, because of the high BME take up of VCS services.	The Health Improvement Team will support providers/organisations and service users proactively with advice and sign-posting as opportunities are identified.	The principle concern raised is the consequent ceasing of the breast feeding service run from Keighley Healthy Living. It is a preventative service, allowing children a good start in life, through encouraging and supporting longer periods of breast feeding. It helps prevent health problems (obesity, osteoporosis, gastrointestinal, respiratory, cancers). It will lead to a loss of hospital visits support. It was felt that even if all other services were ceased from KHL, that the breastfeeding service should continue even if hosted elsewhere. It was suggested that if every woman breastfed for 4 months it would save the NHS £40m a year. There was separate concern over the loss of health support for young people through cessation/reduction of these budgets. Commissions need to be modernised and outcomes related.	Better heath, better lives

				As a lot of these commissions are run by the VCS, it was suggested that this brought in great value for money through their engagement of volunteers. More people take up new activities as a consequence and trust is built at a community level. There was a suggestion that reductions could be made through discussions but that the cessation of the funding would not be the answer - a streamlined service with a small number of trained peers across the district would work. There was concern that reductions of funding in this area would have a detrimental affect on the Roma communities. LACO as one of the few organisations working with this community would welcome a dialogue about future shared support of Roma people. It is felt that not enough notice has been given to commissioned organisations, who had been planning ahead, but who will now not receive funding. They bring much additional benefit to the district with volunteer time, extensive community networks and links, and millions of pounds of third party revenue. Several comments were also received in support to health	
4PH7	Small Grants (VCS	Equality assessment	n/a	services run in the Windhill area. There was concern about removal	Better heath,
	funding) - cessation of small grants delivering projects on sexual health, smoking cessation, cancer awareness, teenage pregnancy, and healthy lifestyles.	carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics		of the suite of small grants to tackle obesity, heart disease and cancer in the wards where residents experience the poorest health. A reduction not a cessation to the funding was suggested, with a whole systems approach.	better lives

				There has been particular concern about the closure of the Healthy Lifestyle programme. It is a popular	
				'open-door' service which if lost will impact on the health of the district. It focuses on preventative work and trains numerous volunteers, helping people look after themselves and make positive health choices. This includes supporting people with mental health problems such as depression and loneliness. Support	
				for carers is also an important aspect of their work. It was suggested that more measurable ways of evidencing progress needed to be adopted.	
4A1	Adults - Overall Demand Management Strategy - moving from a dependency model to one that promotes independence and resilience (e.g. reducing numbers coming in to care, care system culture change, speeding up integration, redesign enablement, reviewing financial needs, continued personalisation).	Older people and people with Mental Health & Learning Disabilities will predominantly be affected by this proposal but the focus will be on personalised services for people so the impact on protected characteristics will be mitigated at individual level. As part of the Strategy to reduce residential and nursing places it is intended that more extra care schemes are developed, which will help to improve people's lives and reduce expenditure across all groups. As the proposal is developed, the detail of impacts will be further assessed to ensure any potential implications on protected characteristics are minimised.	Our approach will seek to focus on people's strengths and enabling people to manage properly understood, proportionate and positive risks in living their lives. We will undertake individual assessments and carry out extensive engagement with service users, carers and advocates to ensure seamless transitions for any service users affected. This will enable us to meet our duty under the Care Act 2014 and mitigate against any disproportionate negative impact on any person with a protective characteristic. By offering other options for people in terms of housing and care support, people will have the opportunity to access appropriate services that meet their assessed needs and be in a position to maintain their independence and to continue to have a positive contribution and be inclusive in their local community. This will ensure where possible people with particular characteristics are not	Concern over the future of dementia care and that the elderly needed more support. There was a suggestion that more money should be sought from the government in the same way that the North Yorkshire authority did. It was also suggested that a focus on reducing waiting times between referral and support was needed. More money going to support the increasing numbers of elderly people was felt to be important, with more help with home care. The suggestion of closure of any care homes causes concern, especially those supporting people with dementia. More dynamic and creative support is needed e.g. supporting someone to become more independent by helping them learn to cook. To begin with they will need more support but less as time goes on. People need to be in homes they can maintain themselves and have	Better heath, better lives

			disproportionately affected. We will further review the potential impact on protected characteristics as part of the development of the delivery programme.	the additional support to remain independent as long as possible. Concern over reductions in social care will lead to more bed blockages in hospitals.	
4C5	Service Wide - Further management savings - a review is undertaken of the management structure within children's social care	n/a	n/a	Greater efficiencies should be found.	
4C6	Early Help - Management restructure - review structures in early help for children and families commissioned from VCS, youth offending team, crime prevention, family centres, families first.	This service works with a higher percentage of children and families from disadvantaged households and any reduction in service may result in a disproportionate affect on low income groups needing this support.	The review will ensure that resource is most effectively targeted at areas of need, with careful mapping of service needs and outcomes. This process will be done alongside the VCS to ensure that impact is mitigated where possible. Where possible, resources will be reduced in back office and management functions.	It was felt that investment in pre- school children was vital for the future.	Better heath, better lives
4C12	Early Years school - removal of transitional funding readiness - reduction in grants to small providers undertaking community based activity to help prepare children for school.	Equality assessment carried out indicates that this proposal is unlikely to have any detrimental impact and so there is no disproportionate impact on any group that shared protected characteristics.	n/a	Focus should be on supporting children not administration costs.	Great start, good schools
4E7.	Remodel of Visitor Information & frontline service - reduce the number and/or size of Visitor Information Centres (VICs), moving to a more digital basis promoting the district to target audiences, with the potential for VIC information points as co- located provision.	The potential closure of VICs could have a disproportionate impact on older customers unable to access information electronically.	Alternative options are being explored including seasonal visitor information centres in destinations such as Saltaire, Haworth and Ilkley with support from local groups.	It was felt that visitor information centres work well due to their personalised approach to the service. Resources including VICs should also not just be focused on Bradford city centre, but support given to outlying areas too. There was also concern over the impact on tourism and consequent economic benefits from any loss of VICs.	Better skills, more good jobs and a growing economy
4E8.	Events and Festivals - review to develop a more	Equality assessment carried out indicated that	n/a	Some feel that greater cuts should be implemented, others feel more	Better skills, more good

	sustainable and balanced events programme. Direct funding to	this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics		support should remain with arts programmes. Support for continued funding to arts project was also received, with the view that they contribute economically and culturally to communities. It promotes tourism and attracts new businesses and provides employment opportunities. Some felt that private enterprises should be responsible for events.	jobs and a growing economy
4E9.	Libraries - reduction in the number of libraries directly provided. Investigate potential for alternative delivery models.	Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics	n/a	It was felt that volunteers would need an intensive training programme should libraries move into community ownership. There was also support for libraries being part of community hubs to focus community resources to a single location. There was concern that areas of deprivation would not have the community capacity to run a local library. The libraries facilities, such as computers and photocopiers as well as books, are a vital resource. Where libraries already reside in community halls there is further concern as the Community Halls are under review as well.	Better skills, more good jobs and a growing economy
4E10.	Theatres and Community Halls - Trust type models being investigated. Community halls to be transferred through Community Asset Transfer where possible.	Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics	n/a	Closure of the community halls would not just take away a facility but also stop all the activities that take place in them from happening. The halls are used by a very diverse range groups which are fundamental to local communities. Local charities are also supported through fundraising activities that take place in these halls. There was concern that recent investment to halls would prove a waste of money, as would volunteer time in raising some of the funds. It	Better skills, more good jobs and a growing economy

4E12.	Ministry of Food - possible	Whilet the Ministry of Food	The Heelth Improvement Teem will	 is felt that community halls can be the only secular community meeting point. Not all areas have enough volunteers or expertise to take on the running of halls. With expanding populations, more community facilities are needed not less. There were also suggestions of ensuring there was one community supported building/hub in each area that housed all essential services. To make them profitable, space for businesses and residential dwellings could be included. They need to be run in a more commercial way. It was suggested that professional support with fund raising from the Council would help communities maximise the use of the halls. 	Pottor okillo
4E12.	Ministry of Food - possible cessation of the service teaching people how to cook, eat and improve their long term health.	Whilst the Ministry of Food is a discretionary service provided by the Council, its closure will by definition have a disproportionate effect upon those people who share a protected characteristic. Those attracted to the services provided by the Ministry of Food tend to be those from disadvantaged communities where behaviour change is required to reduce obesity through education and	The Health Improvement Team will support providers/organisations proactively with advice and sign- posting as opportunities are identified.	The Ministry of Food does more than just provide food and nutrition advice. It is a service in itself that provides necessary skills to people saving them from accessing health services in the future. The centre is used to support vulnerable people, tailored to their individual needs and getting them involved in community life e.g. people with Asperger syndrome, disadvantaged people. There was a suggestion that this service wasn't being used to its full potential and could be paid for by	Better skills, more good jobs and a growing economy
4C3	Children's Services - a	teaching cooking skills. This proposal in regard to	To mitigate the notential	schools.	Better skills,
405	prepared and Skilled Workforce - staffing, restructure, reduction in the Connexions contract	the Connexions Service contract will have a negative impact on people	To mitigate the potential disproportionate impact of the Connexions Service propsal, there will be a re-design of the	There are many concerns over the loss of work provided by the Connexions service. Face to face support is vital. It provides advice	more good jobs and a growing

	with longer term service brought back in to Council, investigate regional data centre, cessation of Employment Opportunities Fund (EOF).	characteristic. This service directly supports young people who are NEET, the cohort being comprised of young people with complex and multiple needs related to the protected characteristics and long- term low-income unemployed adults.	a minimum statutory service with a greater reliance on the Bradford Pathways approach that will be underpinned with more effective information, advice and guidance framework. Greater linkages and working Page 52 with other front line staff working with young people will also be explored. It is not feasible to fully mitigate the impact of the proposals given proposed funding levels.	 housing, drugs, alcohol, domestic violence, social care referrals. The help is received by people with a range of issues including mental health, behaviour, attendance, families. It was suggested that funding for young people could be centralised through Connexions, picking up services provided through housing support and families first. There is a lack of support for both prevention and resolution of young people's problems. Concern over loss of funding for the EOF and the likely impact on increased young people not in employment or training. 	
4R4	Regeneration Services - Centralisation of Urban Traffic Control including reduced maintenance of street lighting asset	n/a	n/a	There are already too many street lights not working, it was suggested this would get worse with further funding cuts. It was suggested a PFI agreement (as happens in Leeds) could reduce costs.	Better skills, more good jobs and a growing economy
4R6	Options related to discretionary budgets for highway maintenance works including minor drainage improvements, pavement repairs and footpath and snicket maintenance	Whilst the cost of the works delivered through the local area maintenance budgets may be relatively small, the impact of non-action could have a disproportionate impact on the lives of the districts citizens. Some footpaths and snickets are currently impassable due to lack of maintenance which is a consequence of the current reduced budget allocation.	As the scope of the impact arising from this proposal could be wide ranging and dependent upon the nature of any specific maintenance requirements, it is not possible to propose measures to fully mitigate or eliminate the disproportionate impacts. However, the nature of the prioritisation framework (which is still to be developed), which would be used to assess the priority for action of any requests, could incorporate appropriate consideration of the characteristic of the person needing action (e.g. include age and/or disability criteria).	Concern that reduced maintenance would lead to reduced footfall in city and town centres which would have a knock on to businesses being successful (and therefore business rates paid). There was a suggestion that highways maintenance would cause issues and be at odds with the active travel programmes. Poorer access will also have a detrimental impact on people with disabilities.	Better skills, more good jobs and a growing economy
4R7	Reduction in Highways	Failure to undertake any	Any loss of a subway/underpass	The existing and proposed	Better skills,

	Services operational budgets associated with operational accommodation, transport gateway and subway maintenance.	maintenance of gateways and subways will very rapidly lead to these assets deteriorating and potentially becoming impassable. Winter maintenance operations would be significantly impacted by the reduction in DLO operational bases meaning longer times being necessary to grit the routes in the district, Page 57 potentially meaning that areas in the north of the district may be untreated in periods of inclement weather. This could therefore impact on some of the protected characteristics	facility could be offset through the introduction of a crossing. Research has shown that these types of crossing are more attractive to pedestrian users than subways as they are generally perceived as reducing the fear of attack/crime for pedestrian users. However, such facilities on major corridors are problematic as they need to cross six lanes of traffic and therefore their design can lead to increased delays for general traffic and increased frustration for drivers. The impact of the closure of the depot at Stocksbridge and the consequent impact on winter maintenance operations will need to be carefully considered within the context of winter gritting routes and treatment programmes. Consideration of more pro-active treatment regimes for areas in the north of the district will need to be developed in order to ensure that problems associated with reactive maintenance are mitigated.	reductions in gritting is causing problems especially in the Keighley area.	more good jobs and a growing economy
4R11	Introduction of limited lighting hours / switch off of street lighting on non- principal road network	Introduction of this proposal in additional areas of the district will have a disproportionately negative impact on some protected characteristics. Fear of crime amongst the elderly will increase where back streets and residential roads are unlit during the early hours of the morning and it is from this characteristic group that the greatest impact is anticipated. Similarly fear of crime on unlit streets could adversely impact the protected characteristic groups of disability, race,	The Council has developed a set of criteria which are used to select streets where limited lighting hours are introduced. These criteria assess road safety statistics, criminal activity records, infrastructure condition and involve consultation with the local community on any proposals being prepared. Any streets which are considered appropriate to be included in the programme of limited lighting operation will be fully appraised using this model before a decision is taken on whether or not to implement the limited lighting hours infrastructure is taken. Those streets with high criminal activity and/or poor road safety records will	Reduction in street lighting could encourage anti social behaviour and crime.	Better skills, more good jobs and a growing economy

4E1	Parks and Bereavement – parks, recreation grounds and woodlands offered as community asset transfer; management rationalisation; withdrawal from direct management of sport pitches and bowling greens; raise prices of bereavement services.	religion/belief and sex who may all experience increased levels of concern about the proposal. With regard to bereavement service proposals, any increase in charges, particularly at a rate above inflation, will by definition have a disproportionate effect upon those on low incomes for a service that cannot be viewed as discretionary. Given that cremation charges are currently lower than burial charges, particularly should a new grave be required, any percentage price rise will generate a higher cash increase in the cost of burials than that of cremations. This could	not be included in the project beyond their initial assessment. To avoid any undue distress to local residents only those streets which "pass" the desktop assessment will be consulted upon with the local community. The most deprived/low income communities receive support for the cost of funerals from the Council through Adult Services. The proposed above inflation increase in charges for funerals will result in local service users continuing to pay less than the average within West Yorkshire for all services. Page 66 It is intended to introduce a reduced rate for the walling of graves to coffin height which will mitigate the effect of the increases for those faith groups that adopt such a requirement.	There was concern that reduced funding for parks would not support people with and likely to have mental health issues. Most comments reflected on how effective bowling clubs, and the greens, were at providing exercise and reduction in isolation for older people - though they are used by people of all ages. It was felt that each club managing its own maintenance would not be a wise use of money, as all would need their equipment. Some were happy to have charges increased to ensure the maintenance remained with the Council. Other comments suggested that	Safe clean and active communities
		represent a disproportionate effect for those religious and faith communities that favour burial. The implementation of a flat rate cash increase		greens could be reduced to one per park, and others suggested that only the most popular greens be kept. Further suggestions were that fees	
		to both cremations and burials would however have increased the cremation charge to a level disproportionate to that of the burial charge in terms		and costs should be increased on other services to allow some bowling greens to maintain support e.g. library charges, no free buses, higher leisure centre charges.	
450		of comparator values of neighbouring Councils.		More discussions with representatives of the greens was encouraged to help reach a mutually agreeable solution.	Defende
4E2	Waste Collection and Disposal Services -	The proposal is likely to have no or a low impact on	It is recognised that the elderly and disabled could be impacted upon	It was felt more investment was needed in tackling fly tipping. More	Safe clean and active

	introduction of co-mingled recycling enabling more plastic recycling.	everyone so it is considered that there is no disproportionate impact on any group who share protected characteristics. It is however recognised that a move to alternate weekly collection could result in the residual waste bin being heavier to move around.	by a heavier bin where there are mobility or accessibility issues. The Council already provides assisted bin lifts for residents in such circumstances. If this service is required, residents can call the Council Contact Centre and a home visit will be arranged to see how the Council can help.	fines are needed to help the enforcement of people dropping litter and fly tipping.	communities
4E4	Environment and Sport - Customer Services - redirect face to face contact towards self service and telephone services will see a continuing decline in contact resulting in staffing efficiencies. Automated services will increase with fewer options for people to speak to a customer services advisor. More people will be expected to 'self serve' using on line services.	The Council recognises that any move toward increasing dependency on digital/online access to Services or information may potentially have a detrimental impact on residents who do not have English as a first language or who don't/can't access IT. Making services available electronically could impact on those unable to access due to ability or lack of available technology. Those with a preference or requirement to deal with a person may feel anxious and vulnerable. The majority of current face-to-face customer service and an increasing proportion of telephony work is with low wage/low income groups, including people with disabilities, and older people although there has been a significant increase in enquiries from customers from Eastern Europe who have language barriers. Customer service teams carry out some home visits to customers who are unable to access	To mitigate the potentially disproportionate impact the Council remains committed to the Five Principles of Producing Better Information for Disabled People, and will also continue to make sure the Council website is accessible. Greater self service access will provide the majority of citizens with a more efficient service; thereby freeing up the limited resources to focus on those who need the additional support. By minimising avoidable face-to-face and telephone contact with the council, officer time can be better directed to those customers who require it.	It was felt that digital access is not suitable for many gypsy and travellers.	

		Council services in other ways. However, in the context of the number of enquiries handled by the Council each year, the relative numbers of people adversely impacted by the proposed change is small.			
4E5	Street Cleansing and Public Conveniences - reduction in number of ward based clean teams and mechanical sweepers; removal of funding for public conveniences.	The proposal has the potential to have a low impact on predominantly inner city highly densely populated areas. The people who live in these areas are in the main white people on low incomes and communities from BME backgrounds. In terms of closure of the toilets there is likely to be a disproportionate impact on older people, pregnant women, parents requiring access to baby changing facilities, young Page 69 children, transgender community, disabled people, particularly those with complex needs, and people who, because of their physical condition, may need to visit the toilet more regularly.	Increased waste awareness and anti litter/education campaigns in affected areas and the new robust enforcement model for targeting those people that drop litter, will mitigate the impact the street cleansing proposals. In the case of public toilets work will take place to ascertain whether Parish/Town Councils, community or other voluntary groups could take over the running of those blocks proposed for closure. Consideration will also be given to whether local businesses, cafes, restaurants etc. would allow people to use their facilities.	The focus has been on public conveniences (PC's), with only a few comments on actual street cleansing. In all cases it is felt that PC's should not be closed as they provide a valuable facility for local people and encourage tourism. There is concern that closure will lead to people being isolated in their own homes, and knock on environmental concerns. There was a suggestion that more PC's could ask for donations. Pubs and cafes could also provide clear signage welcoming people to use their facilities. An alternative was to put in place a bylaw requiring that all shops and cafes allow the public to use their facilities - this apparently happens in Florence, Italy. Closure would affect a lot of people including older people, disabled people and children. There was also concern about cleansing (alongside kerb side collections including recycling), and that a universal service is not appropriate as needs vary greatly across the district. Others were concerned about future driving conditions if the environment was affected. It was suggested that more community work was needed	Safe clean and active communities

				to raise awareness of littering and fly tipping.	
4E6	Cessation of the Pest Control Service - cease providing the 'paid for' service.	This proposal could have an adverse impact on people on low incomes as it removes the facility to pay for treatments in instalments although the equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics	The most common request for treatment is to deal with rats and mice and there is at least one company in Bradford which is able to provide the service cheaper than the Council.	Concern that this wouldn't be appropriate.	Safe clean and active communities
4H2	Human Resources - Terms & Conditions - Removal of non contractual overtime payments and removal of essential car allowance lump sum payments.	n/a	n/a	Concern that staff will have to use their own cars instead of pool cars/public transport.	A well run council
4X1	Office of the Chief Executive Restructure - service influences, negotiates, communicates and collaborates with communities and partners to deliver the district's priorities.	Until the detailed restructure proposals are drafted it's not possible to be specific about impacts on equalities characteristics within our communities. However it is expected that would be some low level impacts across a number of groups.	Communication and collaboration with voluntary, public and private sector partners at local and regional level will need to increase and less formal, more responsive and dynamic partnership structures / reporting will need to be developed. Clear prioritisation, and the concept of the Council being the lead facilitator and negotiator rather than the lead provider of resources, will be necessary in developing the capacity to capitalise on a considerable partnership asset base for the benefit of Bradford District. The absolute necessity to develop the Council's partners' and communities' skills and confidence in being fully part of Team Bradford,	Concern over unnecessary expense in this area following major cuts already made.	A well run council

			finding innovative approaches to service provision together, would have to be the overarching priority for the new, integrated corporate function. To operate effectively within the context of rapidly diminishing resources for the 'local state' only focused, high priority work would be undertaken, working closely with Members, officers, partners and communities.		
Not proposal specific	Raise in Council Tax	n/a	n/a	Most comments reflect that people don't want an increase in council tax. People felt they cannot afford increases in council tax, especially as wages/incomes are not increasing as well. It is felt that the social care 'levy' be spent on social care, but that this is unlikely to be a long term solution. Other comments suggested that more should be done to collect unpaid council tax.	A well run council