

# Report of the Assistant Director, Office of the Chief Executive to the meeting of Executive to be held on 5 February 2019.

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## Subject:

Consultation feedback and equality assessment for the 2019-20 Council budget and proposals for 2020-21 Council budget.

## Summary statement:

On 4 December 2018 the Executive approved new budget proposals for consultation 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 2019-20 and 2020-21. 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 2019-20 and proposals for the 2020-21 budget.

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## SUMMARY

- 1.0 On 4 December 2018 the Executive approved new budget proposals for consultation 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 2019-20 and 2020-21. 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 2019-20 and proposals for the 2020-21 budget.

## 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. The Council's approach to equalities goes beyond this, by looking at equality more broadly and taking into account the impact of our decisions on people on low income or with a low wage.
- 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 There is a range of guidance materials on the Public Sector Equality Duty from The Equality and Human Rights Commission (EHRC), last updated in 2014, 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 decision-making 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 2019-20 and 2020-21 Budget Setting Process**

- 3.1 The public engagement and consultation programme in relation to the budget proposals for 2019-20 and 2020-21 was agreed by the Executive at its meeting on 4 December 2018. 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 2019-20 and 2020-21 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. This would also be extended to those on low income/low wage.
  - Ensure that Trade Unions and staff are consulted 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 forms.

- 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 4 December 2018 have been available on the Council's web site since that time. <https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2019-20/>
- 3.5 Following a review and assessment of the consultation feedback, EIA forms will be updated then republished at the same time as the papers for the Executive meeting on 19 February 2019.

#### **4. Cumulative Equality Impacts on the 2019-20 and 2021-21 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 4 December 2018 for consultation. 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 implemented and further consulted on.
- 4.3 Individual proposals that have more than one high level impact on different number of protected characteristic groups are listed below.
- A prepared and skilled workforce (4C3)
  - West Yorkshire Combined Authority (WYCA) Transport Levy reduction (4R2)
  - Oral Health Improvement – school nursing & health visiting (4PH1 Part a)
  - Sexual Health Services (4PH3)
  - Welfare Advice and Customer Service Transformation (6X1)
  - Youth Services (5E2)
- 4.4 The protected characteristic of age is very high primarily for young people across the proposals listed at 4.3. Older people are however also affected through the WYCA levy changes and potential reduced subsidies for public transport, as well as welfare advice and customer services proposed changes. Of the total 32 proposals undergoing consultation 17 show impact on age.
- 4.5 Likewise for disability, there are fewer proposals showing high impact, but still 13 showing impact across all proposals. The areas of most concern are the proposal for a Prepared and Skilled Workforce (through bringing in the service in house at a reduced cost); the WYCA Transport Levy impacting on subsidies; and the changes to Welfare Advice and Customer Services.

- 4.6 Across all proposals 19 show impacts on people with low income and low wage. Most high impacts will be felt through the range of Public Health proposals in the Better Health, Better Lives outcome, but also the Prepared and Skilled Workforce and Youth Service proposals both of which will involve a reduced budget and changes to service delivery.
- 4.7 Another protected characteristic being affected by a larger number of proposals, 12 in total, is race again through the Prepared and Skilled Workforce proposal and the changes to Welfare Advice and Customer Services.
- 4.8 Pregnancy/maternity also features with proposals supporting the health and wellbeing of mothers of young children, primarily impacted by the range of Public Health proposals (e.g. sexual health, school nursing/health visiting).

## 5. Consultation Process

- 5.1 The consultation programme for the budget proposals for 2019-20 and 2020-21 is part of an open, on going conversation between the Council and citizens, voluntary and community sector, businesses, Council employees and trade unions about the future of local services.
- 5.2 The consultation programme opened with the publication of the report the 'Proposed financial plan updated 2019-20 to 2020-21' on 26 November 2018 which the Executive approved for consultation on 4 December 2018.
- 5.3 The consultation and engagement programme has included the promotion of the open public consultation to groups, networks and individuals throughout the district. This has primarily been via the website with a supporting freepost address for those people wishing to write to us. An easier-to-read with accompanying audio version of the budget information was also made available. There have also been regular posts promoting the consultation through the Council's corporate social media accounts and Stay Connected e-mail newsletters for residents. The consultation has been promoted to:
- Partner organisations from across the district
  - Parish and Town Councils
  - Voluntary and Community Sector – with discussions on going throughout the year
  - Business community – via forums, networks and the Chamber
  - Members of Parliament
  - Communities of interest
  - Citizens Panel
- 5.4 To ensure interested people are able to maximise their engagement in the consultation, a number of Council services have undertaken additional consultation on some of the proposals. Those additional activities are listed below.

Proposal	Consultation dates	Consultation overview
Libraries (4E9)	17 – 21 January 2019	<ul style="list-style-type: none"> <li>• 5 Stakeholder engagement events at: Ilkley, Shipley, Keighley, Eccleshill, Wibsey Libraries.</li> <li>• Aimed at general public, parish/town councils,</li> </ul>

		<p>Elected Members, community organisations, accountable bodies.</p> <ul style="list-style-type: none"> <li>• Additional sessions at other district libraries are also taking place outside of the formal consultation period.</li> </ul>
Museums & Galleries (5E1)	19 – 20 January 2019	<ul style="list-style-type: none"> <li>• 3 Stakeholder engagement events at: Cartwright Hall, Cliffe Castle, Industrial Museum</li> <li>• Aimed at Friends of groups, general public, parish/town councils, Elected Members, community organisations.</li> </ul>
Welfare Advice & Customer Services (6X1)	17 January and 24 January 2019	<ul style="list-style-type: none"> <li>• Two consultation events covering all Health and Wellbeing Department proposals including one specifically focussed on disability and older people with BSL Interpreters provided.</li> <li>• This is in addition to regular engagement and consultation that takes place as part of service delivery.</li> <li>• Direct conversations with existing providers, in shaping a future service regardless of budget available.</li> </ul>
Public Health (4PH1,2,3,4,8, 6PH2)		
Adult Demand Management (6A1)		

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 at the Council meeting on 21 February 2019.

## 6. Consultation – Number of Responses

- 6.1 This report provides information on feedback received at the date of submitting this report for publication on 25 January 2019. Any feedback received between this date and the consultation closing on 27 January 2019 will be provided as an addendum to the Executive meeting on 5 February 2019.
- 6.2 From the views shared since 26 November 2018 as part of the current consultation, as of 25 January 2019 the Council had received 332 comments from people or groups. Of this, 202 were in direct relation to the different budget proposals for 2019-20 and 2020-21, including the proposed increases to Council Tax. A further 130 comments have been made that are not specific to particular proposals for the next two years. These comments were received from the online questionnaire (234), postal questionnaire (88) and letters and emails (10). Of the letters and emails received, 5 have been representations from organisations with an interest in the proposals, be that other public sector organisations or small organisations currently delivering services on behalf of the Council.
- 6.3 Further to this there has been additional input through the proposal specific workshop/focus group consultations (as outlined at 5.4). These were well attended by a range of service users, community organisations and volunteers, with the following

numbers engaging in more detailed conversations with Council service representatives.

<b>Proposal</b>	<b>Number of attendees</b>
Libraries (4E9)	172
Museums & Galleries (5E1)	60
Welfare Advice & Customer Services (6X1)	56
Public Health (4PH1,2,3,4,8, 6PH2)	
Adult Demand Management (6A1)	

6.4 Monitoring of the corporate social media accounts and Stay Connected newsletters on the budget consultation has shown over 1100 click-throughs to the online consultation pages. It is worth noting that overall activity on the corporate social media accounts around the consultation has however been 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 The proposals generating most comments through the survey and letters/emails received were:

<b>Proposal</b>	<b>Number of responses</b>
Welfare Advice & Customer Services (6X1)	141
Libraries (4E9)	93
Raise in council tax	53
Youth service (5E2)	5

6.6 A further 14 proposals only received one or two comments. Street Cleansing, which was consulted on last year, has also received a further 13 comments this year, even though the budget for this proposal has already been agreed.

## **7. Consultation – 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. These comments have come through the online/postal questionnaire, social media, direct emails, letters, service specific consultation and meetings with Parish and Town Councils, businesses and the Voluntary and Community Sector.

7.2 Listed below are the feedback headlines on some of the budget proposals identified for the next two years (2019-20 and 2020-21). Fuller detail is presented at the end of appendix 2.

### **Welfare advice and customer services (6X1)**

- There are a great many vulnerable, disabled, non English speaking, non-IT literate people who need support, as well as people who are facing challenging life circumstances through no fault of their own. It is felt the equality impact assessment needs to focus more on these groups, and more mitigations considered for those with complex health problems and mental health issues.
- Moving to primarily digital services will not support those who need face to face support, and the expectation that this will get a greater focus with more digital is

not felt to be realistic.

- Commissioning through the voluntary and community sector leads to more volunteers, training and employment opportunities and therefore greater value for money.
- There is strong support not to centralise services, but to keep community hubs. It is suggested this broadens access, allows personal relationships and trust to be built, and provides timely interventions (which can be critical). Some people cannot travel outside of their immediate communities, meaning a central Bradford service would be inaccessible.
- It has been highlighted that the users of these services are some of the most vulnerable in the district, and continuing this support can lessen costs in the public system later on and provide greater social value. Issues are often time critical and any service reductions will lead to longer waiting times.
- It is felt that there are more opportunities for collaboration with other public and voluntary services.
- Responses have been received from some providers of community based advice services but also from people who have volunteered in centres and have seen the front line value of what they provide.

#### **Libraries (4E9)**

- Respondents are highlighting the valuable service libraries offer beyond borrowing books, acting as a community hub for social groups and education.
- Many are also highlighting that volunteers can't be relied on solely to run libraries. Professional staff are seen as being experts in their field, accountable and offering good customer service.
- There are suggestions that City Library should be moved in to a Council owned building.
- It is also suggested that house builders should pay levies to provide library services where new homes are built.
- Though most respondents are keen for libraries to remain located across the district in community hubs, a few are supportive of a centralised service, with mention of using a currently Council owned building from which an 'Ideas Centre' could operate for the benefit of the whole district.
- It was suggested that government should be lobbied to invest in the alleviation of digital poverty, therefore maximising future provision of services such as libraries.
- It was felt that there were more revenue opportunities from libraries.
- Further consideration should be given to combining with other community hubs, with many public and voluntary services running from one place in each community in the district.

#### **Council tax increases**

- There have been numerous suggestions that increases in Council Tax are not fair, as wages are not rising as high.
- Some people have questioned the balance between increased Council Tax but reducing services.
- A couple of comments suggest that Council Tax could go up more to pay for much needed services such as welfare advice.
- A couple of people feel that more effort should be put in to collecting unpaid tax.

#### **Youth service (5E2)**

- It is felt that existing funding reductions have already led to increases in anti social behaviour and crime.
- It was suggested that young people need a safe space to meet with friends, discuss with trusted adults issues of concern and life choice.



- Consultees feel that as a preventative service, it should be invested in.

7.3 Further comments were also received on proposals not specifically being consulted on, and general comments for the Council to consider. The highlights of these are provided below, with further detail presented at appendix 2.

<b>Cleansing Services</b> <ul style="list-style-type: none"><li>• It was suggested that the cleanliness of the district needed improving, with particular concerns over fly tipping.</li><li>• Residents and businesses should clean up the public space around their properties themselves.</li><li>• It was felt that more litter bins should be placed at bus stops and outside takeaways.</li></ul>
<b>Lobbying</b> <ul style="list-style-type: none"><li>• There was a suggestion that more lobbying with central government is needed, to reduce the austerity measures. For example to bring in investment for digital capability, energy efficient lighting and anti knife crime.</li></ul>
<b>Efficiencies</b> <ul style="list-style-type: none"><li>• There was a suggestion that there should be fewer Councillors, and that Councillor and Officer payments/salaries should be reduced.</li><li>• It was felt there was greater opportunity to raise income, through increased parking charges, and recovering unpaid debts.</li></ul>
<b>Housing</b> <ul style="list-style-type: none"><li>• Concern was felt over a lack of social housing and shared ownership schemes, and that brownfield sites, especially former mill buildings, be renovated for housing.</li></ul>
<b>Climate Change</b> <ul style="list-style-type: none"><li>• ‘Decarbonisation’ of the district’s economy is felt to be vital and should be a key part of the Council’s financial plan.</li><li>• It is felt that more of the district’s strategic planning needs to be orientated around climate proofing for the future.</li><li>• Examples of assessing climate impact on the economy have been shared, demonstrating how money could be saved and the economy stimulated.</li></ul>

7.4 **Feedback directly from voluntary and community sector (VCS)**

In the context of the Council’s budget proposals a dedicated session was held with members of the VCS Bradford District Assembly, senior officers of the Council and the Executive Member responsible for Neighbourhoods and Community Safety. It has been agreed that closer working relations are needed between the Council and VCS to help ensure the best outcomes for communities. We need to collectively make the most of the skills, talents and finances (Council’s own budget and/or external funding) in the district.

It has been agreed that a work programme will be developed to help create a new model of working, focusing on the key challenges facing the district, including making the most of commissioning processes. There is acknowledgement from the VCS of the financial challenges facing public services, and an eagerness to contribute to a thriving district. Some providers have already been engaged directly in future service shaping, independent of the budget consultation. This has most recently been done around the delivery of advice services across the district.

Comments from the sector on specific proposals have been captured in the feedback on proposals, as listed in appendix 2.

#### **7.5 Feedback directly from the business sector**

The business community are aware and acknowledge the financial position of the Council, and encourage the best money saving practices be adopted. There was concern about the capital investment proposal to replace all street lights with LED bulbs. It was felt that this should only be done once the life of current bulbs had been reached.

### **8. FINANCIAL & RESOURCE APPRAISAL**

- 8.1 The financial impact of decisions arising from the consultation will be considered at the Executive meeting on 5 February 2019 and will be evaluated and incorporated into the final budget proposals from Executive to Council on 21 February 2019.

### **9. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 9.1 Equality assessments have been carried out on the initial proposals and will continue to be updated alongside mitigations being considered.

### **10. LEGAL APPRAISAL**

- 10.1 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.

- 10.2 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.
- 10.3 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.
- 10.4 There is also a duty on all Best Value authorities to consult when making changes to services or ending service provision.
- 10.5 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.
- 10.6 In summary it is necessary to ensure that Executive have comprehensive information when considering the recommendations to make to Council on a budget for 2019-2020 and proposals for 2020-2021. 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](#).

## **11. OTHER IMPLICATIONS**

### **11.1 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.

## **11.2 SUSTAINABILITY IMPLICATIONS**

None

## **11.3 GREENHOUSE GAS EMISSIONS IMPACTS**

None

## **11.4 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.

## **11.5 HUMAN RIGHTS ACT**

None

## **11.6 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.

## **11.7 WARD IMPLICATIONS**

As implementation plans are developed for the delivery of any budget decisions, following 21 February 2019, ward impacts will be further addressed.

## **11.8 IMPLICATIONS FOR CORPORATE PARENTING**

There are no issues in relation to corporate parenting.

## **11.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESSMENT**

There are no impacts arising from this report on data protection and information security matters. Feedback from the consultation is anonymous. If any personal details were to be provided, they would not be published, and be securely held.

## **12. NOT FOR PUBLICATION DOCUMENTS**

None

## **13. RECOMMENDATIONS**

- 13.1 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 2019-20 and proposals for 2020-21 on 21 February 2019.

## **14. APPENDICES**

- Appendix 1 – Cumulative equality impacts for budget proposals (2019-20 and 2020-21) as agreed on 4 December 2018 for consultation
- Appendix 2 – Consultation feedback – service and equalities

## **15. BACKGROUND DOCUMENTS**

Report to Executive on 4 December 2018: Proposed Financial Plan 2019-20 and 2020-21 – document Z with accompanying appendices

<https://bradford.moderngov.co.uk/ieListDocuments.aspx?CId=143&MId=6826&Ver=4>

Equality Impact Assessments (for budget proposals 2019-20 and 2020-21)

<https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2019-20/>

**Appendix 1 – Cumulative equality impacts for budget proposals (2019-20 and 2021-21), as agreed on 4 December 2018 for consultation**

**1. Total level of impacts across each protected characteristic group**

Protected Characteristic	Impact Levels			
	High	Medium	Low	TOTAL
Age	6	4	7	17
Disability	3	5	5	13
Gender reassignment	0	2	6	8
Race	2	1	9	12
Religion/belief	0	3	6	9
Pregnancy/Maternity	3	2	6	11
Sexual Orientation	1	2	4	7
Sex	2	3	4	9
Marriage & Civil Partnership	0	1	4	5
Low Income/Low Wage	6	6	7	19

**2. Proposals with multiple high impacts**

Outcome	EIA Ref	EIA Heading	Age	Disability	Race	Pregnancy & Maternity	Sexual Orientation	Sex	Low income /low wage
Skills, Jobs, Economy	4C3	A prepared and skilled workforce	H	H	H	H	N	M	H
	4R2	West Yorkshire Combined Authority Transport Levy	H	H	N	N	N	N	M
Better Health, Better Lives	4PH1 part a	Oral Health Improvement - Services for Children 0-19	H	L	L	M	N	N	H
	4PH3	Sexual Health Services	H	M	L	H	H	H	H
	6X1	Welfare Advice and Customer Service Transformation	H	H	H	H	M	H	H
Safe, Clean & Active Communities	5E2	Youth Service	H	M	L	L	L	N	H

## Appendix 2 – Consultation feedback – service and equalities

(Where proposals have received no comment through the consultation, these have not been included in the table below.)

NEW PROPOSALS FOR 2019/20 & 2020/21					
Ref	Proposal for Change	Equalities Impact	Mitigation	Feedback on service impacts	Feedback on equality impacts
		As published in November 2018			
<b>OUTCOME: Better Health Better Lives</b>					
6X1	<p><b>Welfare Advice &amp; Customer Service transformation</b> Fundamental change to the way the Council and its partners deliver customer facing Services, focussed on customers getting the 'right support at the right time'.</p>	<p>Welfare Advice services could support the full range of people with protected characteristics. Current services are available from independent office bases sited in town and city centres and multiple outreach venues.</p> <p>The proposal is likely reduce direct 'face to face' time for customers as well as centralising service access routes.</p> <p>It is unlikely that the specialist service for people with complex and/or continuing long term health conditions could be maintained</p> <p>Some possible outcomes from the above could be longer waiting times to access services; Increase in those not able to manipulate and/or access internet based options being 'excluded' from services. This is more likely to affect older people, those on low incomes; those without access to computers and/or smart phones; people of no 'fixed abode' and refugees.</p> <p>Overall welfare advice services help people to stabilise their incomes and other aspects of their lives such as financial management, with a focus on preventative advice and offer earlier intervention to avoid adverse impacts, the changes could initially mean Increased use of Housing Options and Council benefit services</p>	<p>To manage what is likely to be a greater call on both services, the project will source more comprehensive digital access methods with increased functionality for customers.</p> <p>Three integration pilots between the Council and current welfare advice contract holders have already started with the aim of reducing 'wasted' contact for the public; filtering queries to the 'right place at the right time' aiming to open up the system enough to manage the complex and difficult problems presented more efficiently. Learning from these will be applied to underpin the new approach</p> <p>New multifunctional IT systems that can support customers to manage lower level 'self service' functions themselves. Any new IT systems should also be able to manage case work and integrate performance management systems across partner delivery agencies</p> <p>Changing systems to a 'self service' orientated models will require publicity and appropriate support in order for the public to understand the change.</p>	<p>The service can't rely on digital as many people do not have good IT skills. When testing digital services, Government figures have shown that 23% of people completing their online survey between 31 January 2016 and 22 May 2018 required help from a non-GOV.UK source. There will also be a further cost of technical IT support being needed in remaining centres. IT systems cannot provide a personal/individual enough service.</p> <p>With library services reducing/changing there are also limited places for access to public computers. English language limitations also make online information inaccessible. Some people also need home visits, which helps people to be more independent. Reducing these services will likely put more people in to poverty and crisis and needing to use food banks or meal provision.</p> <p>These services delivered by the VCS are valued by citizens. They help mitigate short term impacts and help people to stabilise their income over the longer term. They offer early help and preventative support for people thereby saving overall system costs. Some people are concerned that crime levels may go up if people become destitute and desperate. The service also offers good value for money and employment and training opportunities, which can develop the dedicated volunteers into future advisers, administrators, lawyers etc. Every pound spent on good advice leads to money being spent in Bradford - it was suggested that approx £1m in funding reaps £8m in financial benefit (CAB).</p> <p>Current providers work with thousands of people each year, many of whom are vulnerable, experiencing severe financial hardship, experiencing mental health issues and/or domestic violence; people with disabilities; and the homeless. These cuts may leave many people without access to any form of advice, which is necessary as navigating the 'system' can be very complicated. Also when statutory services get things wrong and people are denied help or money, they will not have the support to get justice.</p> <p>Many people cannot access digital methods or afford the return bus fare to the city centre should the service be centralised – including some older people. Public transport is also not accessible to everyone.</p>	<p>The stated mitigation will not provide acceptable outcomes for a range of people. Exclusion is likely to increase, even with intentions for face to face time being released. Currently vulnerable people are having difficulty with Universal Credit applications.</p> <p>More consideration of mitigations is needed for those with complex/long term health conditions. People with mental health issues also need to be considered. This is exacerbated where these people do not have family and friends to help them.</p> <p>Technology and self-help must be additional to traditional ways of accessing service. Cost reduction measures must not make access to services any more difficult for vulnerable groups; access must be prioritised over reducing costs.</p> <p>Equality impacts need to identify people who can't access online systems.</p> <p>It was stated that during 2017-2018 over 57% of people presenting for advice had some form of disability or long term health condition, with these people therefore disproportionately impacted by any reduction in advice services.</p> <p>The cost of a day bus ticket in to the city centre to seek support is not insubstantial on a low income and the alternative of a long walk each way (usually involving a hill) is not achievable for older or less mobile residents.</p> <p>Some women in particular who don't have English as a first language (in some cases former asylum seekers) need help to ensure their potentially inconsistent employment and benefit support are complimentary, ensuring a regular minimum income. Advice services provide this. Any reduced service will impact on these women especially.</p> <p>Information was shared from analysis undertaken by Bradford Community Advice Network in 2015 as stating there were significantly higher proportions of some key protected characteristic groups among advice clients than in the district's population.</p>

				<p>Having drop-in and appointment provision within walking distance improves engagement with hardest-to-reach residents and gives them a safe and secure place to discuss their needs.</p> <p>Advice is often of a time critical nature - less face to face contact time will reduce the quality of support and lead to longer waiting times. There are already long queues at centres with the service already over stretched. Existing central services do not have capacity and often suggest people use their local centres.</p> <p>The Council should continue to work with the VCS within the communities that they are based. Creating hubs with other services is to be encouraged but should still be community based so that additional social value can be provided.</p> <p>GP services could be included in community hubs, alongside advice support. There is a suggestion as well that advice services run from NHS settings are more effective.</p> <p>It is felt this proposal will have a negative effect on other proposals such as the Adults Demand Management (and Homes First vision) with greater demand likely to be created for social workers. Some however value the investment in a more effective digital system.</p> <p>An alliance with local CCGs should be discussed to collaborate on services - e.g. the Bradford Champions groups organise walking groups and singing sessions for vulnerable/elderly to ensure they are not isolated and stuck at home.</p> <p>It is suggested that there are now more people in deprivation coming to Bradford putting yet more pressure on advice services. It is felt that customer services and advice services are two distinct functions that should not be amalgamated. Any integration must maintain independent advice.</p> <p>Current process is hard to navigate which causes stress, major risk that this will get worse. The advice sector and VCS organisations have already identified gaps in services e.g. loss of advocacy service for people with disabilities. Good effective advice supports the growth and links in local communities. If removed grey economies could develop, leaving people being excluded and isolated, leading to greater dependency. It was felt that this could potentially increase criminality. Might also lead to increasing fears and lead to illegitimate exploitation of people. Need to promote where other funding is available to support advocacy and advice. It is also felt there are currently not enough welfare and benefits experts.</p> <p>There is also concern that professionals from other organisations are having to take on roles such as filling out PIP forms. Any reductions will increase this pressure. It is also suggested that a triage type process could be introduced which would alleviate the burden.</p>	<p>Disabled (physical, sensory, mental health, learning, cognitive) clients made up 45% of clients; Black and minority ethnic communities made up 53%; 47% of advice interviews were conducted in languages other than English; Children's Centres and GP surgery sessions had 65% female attendance.</p> <p>People with disabilities already have barriers and the loss of welfare benefit will have a major impact on their ability to maintain their independence.</p> <p>There was concern of the impacts on children for this proposal.</p>
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6PH1	<b>Air Quality Monitoring Programme</b> Reduction of posts in Pollution team and reduce the numbers of operational 'real time' automatic air quality management stations from seven to four.	Proposal will impact provision across the district, but disproportionately impact on low income/low wage households. Poor air quality is more prevalent within the ring road of Bradford, the location of the most deprived wards of the district. Although the removal of monitoring equipment does not change air quality, the ensuing loss of evidence base may impact of the identification of reduction strategies and an ability to measure their effectiveness.	The recent Ministerial Direction to deliver a business case will present opportunities for DEFRA funding. It is possible that funding may be secured to maintain the operation of the AQM stations in conjunction with the delivery of the full business case	Loss of staffing will lead to no specialist expertise in the council. Short term funding may help but is not a long term solution.	No equality comments provided.
<b>OUTCOME: Safe Clean Active</b>					
6E1	<b>Parking Charge Increases</b> Increase parking charges, and introduce charges, across the district for on- and off-street parking	Could disproportionately impact those on low incomes/wages as the cost increase will be more significant for this group.	Consideration could be given to purchasing an annual parking permit for designated car park in area rather paying daily parking charges. These can also be set up as a monthly direct debit to make it more affordable for people. They could also consider using private car parks on the outskirts of the city centre where tariff may be cheaper.	Increasing parking charges will reduce consumer spending in Bradford city centre.	No equality comments provided.
6X1	<b>Welfare Advice &amp; Customer Service transformation</b>	<i>See comments under 6X1 in Better Health Better Lives outcome.</i>	<i>See comments under 6X1 in Better Health Better Lives outcome.</i>	<i>See comments under 6X1 in Better Health Better Lives outcome.</i>	<i>See comments under 6X1 in Better Health Better Lives outcome.</i>

PROPOSALS ALREADY CONSULTED ON IN 2017/18, FOR FURTHER CONSULTATION					
Ref	Proposal for Change	Equalities Impact	Mitigation	Feedback on service impacts	Feedback on equality impacts
		As published in November 2018			
<b>OUTCOME: Better Health Better Lives</b>					
4PH2	<b>Substance Misuse Service</b> – combination of redesign, and re-commissioning recovery service, dual diagnosis service, supervised medication programme, and 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.	Support for the most vulnerable must be maintained. Drug use goes hand in hand with mental ill health, family breakdown, anti-social behaviour and crime and homelessness – putting a strain on other services. It was felt the integration of services needed to be maximised, and opportunities further promoted.  It was suggested that the NHS is shortly to receive more funding and that funds could be pooled to better support a sexual health service. The reduction of resources will have an impact on people with mental health issues. Some agree that we should go with the integration of services however this needs to be supported with tangible / actual support services. For example housing. It was suggested that early help is the right way forward however the lack of tangible performance measures may make it hard for policy makers to measure the impact of interventions and prioritise and shape services.	No equality comments provided.
4PH3	<b>Sexual Health</b> - 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 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.  The Council should pay more attention to local factors rather than relying on national trends.	It was suggested that these services are running with high numbers and consequent concerns that reductions might create a waiting list situation.	It has been suggested by a practitioner that people of BME backgrounds are most likely to be impacted by this proposal, and that more support from within those communities needs to be enabled, with targeted training for them. It is felt that this service will disproportionately affect homosexual and bisexual people, women, young people and some BME people. It is felt this service has been historically underfunded and already cut too much. There was also concern over the impact on equality groups generally.
4PH4	<b>Tobacco</b> –combination of redesign, review of current service model to a stop smoking service targeted at smokers from the most disadvantaged groups and ceasing other services.	At this stage the evidence is not available to confirm whether there will be disproportionate impacts. Further analysis will be needed to build on the equality assessment.	Smoking is strongly related to health inequality and poverty. Services are designed to ensure that disadvantaged smokers make full use of Stop Smoking Services, and medications may increase the quit rates amongst less affluent smokers. However there may be a negative impact as the service becomes targeted and it may potentially stigmatise smokers, for example, based on social class or health condition.	Areas of social deprivation needs a focus and be prioritised in service design. Need to ensure targeted services are accessible to the most isolated and have tangible results. Accountability was also felt to be needed. There was concern that if we target particular people, then those not targeted are left unsupported which might create inequalities. It could be a false economy to reduce services now as smokers will be those who will disproportionately need greater care support.  A more creative approach on health checks is felt to be needed, to increase take up, but it will also help address issues such as social isolation. There are wider health benefits from this service, so	No equality comments provided.

				resources should be pooled across the Health and Social Care system to maximise the impact of resources and investment, while improving overall impacts.	
4E11	<b>Sport and Physical Activity</b> – investigate all methods of future operational service delivery with a combination of transfer, closure, new facilities, alternative delivery models and raising additional income.	No impacts identified	N/A	There was concern over the potential of Bingley Swimming Pool closing.	No equality comments provided.
6A1	<b>Adults - Overall Demand Management Strategy</b> - 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 disproportionately affected. We will further review the potential impact on protected characteristics as part of the development of the delivery programme	There is concern for the future of community care. This service should be seen as a top priority for the Council. Those people already being asked to contribute to their care from their benefits are being put at risk of poverty. It is also felt that external contracts for assessing care needs are not effective.  There is a strong link between changes in social care and the reliance on advice services. The two proposals need to be considered alongside each other - as people get into more debt they end up needing more services, which will have an impact on their general health and wellbeing and this in most cases will mean they will need support from the public sector. Concern has been shared on the reliance of online services, and a loss of face to face services.  There was a strong feeling from some that there is a disproportionate burden on Adult Social Care and as such Health partners need to provide more support.  It was felt that joined up services was a good idea – however it seems that history shows a focus on being medically led rather than having a wellbeing approach, bringing an imbalance.  Health and other professionals view a person from their main condition (e.g. autism) – this tends to mask other issues, which is a major risk and the consequence could be that other serious health issues are not picked up.  Prevention services need investment to make sure the number of complex health needs is reduced. These services also need to be clearly communicated to those who are on the margins of society.	Overall the disproportionate effect of this budget proposal will have a big impact on poor and disable people.

### OUTCOME: Better Skills More Jobs and a Growing Economy

4E8	<b>Events and Festivals</b> – review to develop a more sustainable and balanced events programme and review grant funding while protecting key organisations.	Potential for greater impact on people of low income / low wage. The events are primarily free to attend and any reduction in their delivery could reduce the opportunity for people to attend cultural activities.	Review of Events and Festivals framework is on going and will take into account the protected characteristics to mitigate any disproportionate impacts.	Events should not be decreased as they are one of the best things Bradford offers for everyone such as the light festival and literature festival. It is amazing for the great number of children living in Bradford. Others think that events should be reduced so that money can be invested in more basic services like public toilets, or welfare advice. Cultural events should take place across the district and not just in Bradford city centre.	No equality comments provided.
4E9	<b>Libraries</b> – Review provision of Library Services across the district, consider	Potential reduction in the number of libraries directly managed by the Council may impact on those groups, young and old or low income/low wage that have no	Consultation with and support for communities to help develop proposals and implementation of models of community	Concern over the loss of the quality and diverse offering Bradford district libraries offer. The service is recognised by national bodies and is seen as a 'jewel	Concern over the number of children, young people and families who could find themselves disenfranchised as their local

	<p>alternative delivery models.</p>	<p>alternative access to information or educational/reading materials through other sources (e.g. on-line, purchased) or use libraries as social gathering points.</p>	<p>management outside Council control.</p>	<p>in our crown'. Libraries are useful, current and life enhancing and are thought to be statutory by law and should be valued.          Consideration should be given to imposing library levies on house builders.          Libraries need a core of professionals running them; reliance on volunteers does not create an effective service, with paid staff also being more accountable. There are also consequences with DWP for volunteers, which it isn't felt is acknowledged.          It is suggested that libraries could be merged to make them more cost effective.          More could be made of library buildings such as using them for live music, renting out space/rooms. It was also suggested that paid memberships be set up or have greater fees for books as a means of getting an income. A further alternative was for people to buy in as stakeholders, going beyond just Friends Of groups. It was felt that opening hours could be reduced/adjusted to open when most needed.          Libraries are not just for borrowing books but are used as bases for education, computer use and printing, learning, socialising (especially for lonely vulnerable people), genealogy groups, reading groups for boys, craft fairs, speakers, computer courses.          Concern over existing investment in building fabric being lost.          City Library should be moved to a property that is owned by the Council. There is also concern that the home delivery service will be cut.          One respondent shared their view that the Council should provide a single point of contact in Bradford for the district, remodelling an existing building (Media Museum, Margaret McMillan Tower suggested). The focus should be beyond a traditional library service and become an 'ideas centre' incorporating café, book shop, gallery, research etc. Community libraries would then be sold to create the revenue.          Government should be approached to provide investment to alleviate digital poverty (this would help the library service amongst others).          Particular concern has been raised over the impact on children and their future development. This included concern on the impact on schools with more outreach suggested as an alternative.          If there is any move to having library 'clusters' more consultation will be needed to ensure they are recognised by communities themselves.          The Council seems to be considering a number of hubs across different proposals, including libraries. There was a suggestion that these should be better aligned.</p>	<p>library is lost and larger libraries in the district offer a reduced service.           It is felt the impact of a reduced library service will impact on those people with low incomes.           The concern over the potential loss of the home delivery service will have a detrimental impact on those who are house bound – it provides a valuable service that gives quality of life for those with few other options for pastimes. Some suggest they would be willing to pay a nominal fee to continue having access to this service.</p>
<p>4C3</p>	<p><b>Children's Services</b> – When the current Connexions contract ends in August 2019, re-design the activity to bring the service in house at a reduced cost. Skills House to be funded from base from April 2020, along with seeking partner contributions for an expanded service, some of the costs will be</p>	<p>This proposal in regard to the Connexions Service contract will have a negative impact on people who share a protected 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</p>	<p>To mitigate the potential disproportionate impact of the Connexions Service proposal, there will be a re-design of the Connexions type activity to provide 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 with other front line staff working with young people will also be explored. It is not feasible to fully mitigate</p>	<p>It is suggested that removing preventative services from young people in Bradford will only lead to more cases reaching a higher threshold of need - this will damage those young people, impact on their families and their futures and add more pressure to already over-subscribed social care case loads. There is particular concern for young people not in education, employment or training. It was suggested that managerial levels could be further reduced to help costs.</p>	<p>No equality comments provided.</p>

	offset through the reductions in the Connexions contract.		the impact of the proposals given proposed funding levels		
5E1	<b>Museums and Galleries –</b> Review of service to include potential for income generation, service efficiency and integration and remodelling of operational delivery	No impacts identified	N/A	<p>There was a suggestion that some of the district's arts collections could be sold to raise revenue for vital services currently at risk. Museums are used as locations for people to meet, and are a valuable resource for communities, especially those people and groups who would not be able to afford to pay for their own venues. There was concern over any reduction in opening hours, as that would further reduce visitor numbers.</p> <p>There was some support for joining up services further. For example promoting museums through art installations in libraries; community outreach skills shared; story telling moved from libraries to museums. Volunteering was seen as positive but that people needed support and training, that professionals can't be fully replaced; pooling knowledge across volunteer groups (eg Friends of...); running taster sessions for volunteers.</p> <p>There are opportunities for greater commercialisation through selling or promoting art collections; exploring the available public space for events; linking up with Visitor Information Centres; and creating a history/art trail.</p> <p>Venues need to be made more informal, welcoming and inclusive. Further exploration of funding opportunities that 'Friends Of' groups can bring in.</p>	No equality comments provided.

#### OUTCOME: Safe Clean and Active Communities

4E1	<b>Parks and Bereavement</b> management rationalisation; withdrawal from direct management of sport pitches and bowling greens; raise prices of bereavement services.	<p>Impact on clubs with lower level of membership / players and/or financial resources at their disposal which could ultimately result in some clubs to merge or disband</p> <p>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.</p> <p>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 represent a disproportionate effect for those religious/faith communities that due to their beliefs have no choice between funeral types. The Muslim and East European communities fall in this latter group.</p> <p>The implementation of a flat rate cash increase to both cremations and burials would however have increased the cremation charge to a level disproportionate to that of the burial charge in terms of comparator values of neighbouring Councils.</p>	<p>There is a growing interest from local communities, residents, Parish/Town Councils and sports clubs to become more involved in the operation of public assets, particularly where the opportunity exists to develop community use. Such as having direct access to a range of grant funding bodies whilst 'ownership' allows increased sponsorship and fund raising opportunities.</p> <p>The Service would seek to support individuals/groups of clubs both directly and through the National Governing Bodies to take overall responsibility and would consider an incremental approach over a defined period. Prior investment in the assets to transfer together with elements of seed funding and appropriate rent will allow financially sustainable organisations to develop.</p> <p>The most deprived/low income communities receive support for the cost of funerals from the Council through Adult Services.</p> <p>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.</p> <p>It is intended to introduce a reduced rate for</p>	Cricket pitches need refurbishing.	No equality comments provided.
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			<p>the walling of graves to coffin height which will mitigate the effect of the increases for those faith groups that adopt such a requirement</p> <p>It was suggested that cremation charges shouldn't be increased to offset the costs of burial.</p>		
4E2	<b>Waste Collection and Disposal Services</b> – increased levels of recycling, reduction in residual waste and improved efficiencies.	The proposal is likely to have no or a low impact on 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.	The Council already provides assisted bin lifts for residents where mobility or accessibility issues arise. In this circumstance the resident can call the Contact Centre and a home visit will be arranged to assess how the Council can help.	Current provision does not work, as some streets still have a huge amount of rubbish on them, encouraging vermin that is also getting in to people's homes. Find ways of recycling waste to use as heating. Suggestion to provide incentives for recycling as other Councils do.	No equality comments provided.
5E2	<b>Youth Service</b> – Reduction in the support of youth support activities across the district. In 2019/20 this was to cease youth work grants (already consulted on), and in 2020/21 this is to reduce the Council's Youth Service base budget, with the EIA reflecting these impacts.	There will be disproportionate impact on young people aged 13-19 and on young people with disabilities up to the age of 25. The reduction will mean that the Youth Service will be less responsive to emerging needs of young people and there is likely to be a negative impact in some of the work areas where youth workers currently make positive interventions. Some of the areas of work this will include are: Child sexual exploitation, anti-social behaviour, community tensions and school holiday programmes.	The Youth Service will attempt to raise external funds to continue the interventions the service currently undertakes. Mental Health work currently is funded by Health and the plan will be to continue this.	<p>Existing cuts to youth services have led to anti social behaviour and crime. Young people need a safe space to go to meet with friends, discuss with a trusted adult issues of concern and think about life choices. There are knock on effects of these cuts to other services, such as policing. As a preventative service it should be invested in. Some felt that there are already insufficient services for young people and that further reduction will lead to alienation and impact other services.</p> <p>There is also concern that any reduction in youth services at the same time as a reduction in advice services will leave young people with little support.</p>	No equality comments provided.
<b>OTHER</b>					
n/a	Council Tax (CT)	n/a	n/a	<p>Wages are not rising as fast as CT increases, therefore leading to more people in poverty. There is concern from some that they will not be able to feed their families – having paid their rent, kept a car on the road so they can get to work there is little money left. Some think that CT should increase so that greater investment can be made in services and vulnerable people better supported.</p> <p>It was suggested that the percentage of CT from claimants on benefit should be increased from 25% to 50%. This increase in income will help the Council and will help to not increase the CT by 2.99%. It is felt a lot of debts were written off by the Council last year, so increasing CT will only increase that debt. Others believe that more effort is needed to recover debts. There was a suggestion of having CT paid directly from payslips to avoid non payment.</p> <p>It is suggested that more CT needs spending on outlying areas, rather than just central Bradford. There was also concern that where parish and town councils exist there is additional taxation (precept) propping up the Council's withdrawal of services, which is not fair. Concern that CT payment is particularly difficult for disabled people, some of whom are already not using their heating during cold weather.</p>	No equality comments provided.

**GENERAL COMMENTS ON PROPOSALS NOT FORMALLY FOR CONSULTATION**

Ref	Proposal for Change	Equalities Impact	Mitigation	Feedback on service impacts	Feedback on equality impacts
		As published in November 2018			
<b>OUTCOME: A Great Start and Good Schools for All Our Children</b>					
4C2	<b>Early Years</b> - From 2017 part of the Dedicated Schools Grant will be removed. Plans are being formulated to develop a coherent and targeted suite of early years' services including early help, family centres and early years' including Children's Centres. The proposal is included here as there could be staffing implications.	<i>This proposal was consulted on in full previously. See Executive Document AC 7th November 2017.</i>		<p>There was concern that with increasing demand reductions could not practically be made to this service. Support should be accessible without thresholds, and before crisis is reached.</p> <p>The Council seems to be considering a number of hubs across different proposals. There was a suggestion that these should be better aligned – with children's early help/prevention services and libraries mentioned in particular.</p>	No equality comments provided.
<b>OUTCOME: Safe Clean and Active Communities</b>					
4E5	<b>Street Cleansing and Public Conveniences</b> – reduction in street cleansing resources for 2019/20	<i>2019/20 proposal has already been consulted on so the Equality Impact Assessment has not been replicated</i>		<p>Greater focus needed on sanitation and keeping the streets clean. Concern over levels of fly tipping. There was a suggestion that bins should be upgraded. Suggested to have quarterly bulk waste clean ups. Also to require residents and businesses to keep public spaces around their homes/offices clean, reducing the burden on the Council. Put in place more litter bins such as at all bus stops and takeaways. Suggestion that enforcement to stop littering should be publicised more as a deterrent.</p> <p>There were a few comments about closure of public toilets and the consequent loss of a valuable community resource, and possible health issues.</p>	No equality comments provided.

## OTHER COMMENTS – NOT RELATING TO PROPOSALS

Topic	Comments
Lobbying	There are a number of services which should be funded by government which district leaders need to lobby government for – anti knife crime initiatives, energy efficient street lighting. Government should be approached to provide investment to alleviate digital poverty (this would help the library service amongst others). There was an acknowledgement that Bradford Council should not be blamed for austerity.
Business investment	The Council needs to do more work on encouraging new businesses to set up in the district. Have a review of the retail offer in Bradford city centre, with a strategy to attract more consumers by controlling the costs for coming in to Bradford.
Efficiencies	It was felt that the number of Councillors should be reduced, and that wages should be decreased for both Councillors (including special payments) and Officers (in particular the most senior officers). In some services it was felt there are too many layers of management and staff are being demotivated by poor management styles. Catering costs should be reduced. Christmas meals should not be at the tax payers' expense. The Lord Mayor's car is not a requirement. More enforcement to raise money, for example around parking, and better checking of people's finances to ensure they are paying what they should be. There was some support for long term investments that will save money in the longer term. It was suggested that the Council should invest in local organisations rather than contractors from outside of the district. Also there should be less reliance on consultants to undertake projects, where often the outcome is already known. There is a suggestion of bringing together a wide range of services (housing, customer services, career and life skills advice) into one building. Enhanced procurement processes would help, with Manchester given as a good practice example. It is felt that there is a lot of overlap in outcomes trying to be achieved by various services, and that they should be better connected.
Education	There should be more funding for education. The school system should change, with a greater number of small schools rather than fewer big schools, where respect between teachers and pupils is harder to develop, has greater impact on transport to/from the school with the numbers of pupils involved.
Highways	Reduced spending on highways is already having big impacts, with repairs being made very slowly. A rolling programme of repairs to stay on top of the problem is suggested. Some consultees support greater investment in our highway infrastructure. Gritting of estates and pavements should be reduced and more grit bins provided for communities to be self sufficient.
Capital investment	Building a new sports facility in Wyke was not deemed by some to be a good investment with the cuts having to be made. It has been questioned whether investment schemes will reap the benefits suggested – for example businesses should undertake impact assessments to identify the real social impact of schemes such as redeveloping rail stations.
Housing/Homelessness	Concern over the lack of social housing and shared ownership schemes. There was a supportive comment stating that the Council were doing what they can with homelessness (and youth unemployment). Other comments suggest that homelessness needs greater prioritisation and should be offered like NHS services at the point of need. There is a suggestion that more consultation work should be done on the use of brownfield sites in the district and that former mill buildings should be given a new lease of life rather than sit unoccupied. This would protect historical buildings and safeguard more green sites. It was suggested that the Council could make more money through renting property, and through this providing employment.
Health - general	The Council should take back the responsibility for providing a service to people with mental illness and not send the service out to tender which is then run as a business, not a service.
Income opportunities	There are opportunities for creating income through nominal charges– a community group suggested a small charge for sending event risk assessments for a local event to the Council would have been acceptable. Rate relief seems to be imbalanced – some businesses qualifying, others not.
Active citizens	The PeopleCan initiative was supported but was felt to need further promotion. Community wealth building should be used to empower the local community.
Climate Change	Concern over lack of any reference to climate change in the budget. Efforts are needed to reduce carbon dioxide emissions, tighter building control, converting any unused premises into homes. It is also suggested that investment is needed in a Peace Museum to complement the work the university does on this agenda. "Decarbonisation" of both the Council as an organisation and the district economy is a strategic priority that must be reflected in the Council's priorities and all of its financial planning. It was stated that any strategy for the district to deliver Council priorities that rest on a fossil fuelled economic growth model is reckless and no longer tenable. Continued reliance on this model will not deliver the health, jobs, better homes, education or environment that we need. A Council and community-wide Climate Emergency Plan or Zero Carbon Plan is needed. More tree planting is needed. One respondent provided the following web resource for assessing climate impact on the economy - Can Do Cities: <a href="http://www.candocities.org/energy-and-carbon/bradford">http://www.candocities.org/energy-and-carbon/bradford</a> which shows how much you could save if you reduce energy use, stimulate the economy, create new jobs, cut household bills and reduce the running costs of buildings, transport and industry. It was also suggested that clean energy should be generated on council properties. Investments can pay back very quickly if the current best performing technologies are used. Hydro plans, such as in Saltaire, should also be considered as an investment.