

# The Corporate Plan Equality Impact Assessment

---

## Background

The Council published its Strategic Equality Plan containing its Equality Objectives by 2<sup>nd</sup> April 2012 as required by the Equality Act. The Act covers the following protected characteristics:

- Age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race,
- religion and belief,
- sex,
- sexual orientation.

### The Council now has a General Duty to show due regard to the need:

- To eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act
- To advance equality of opportunity between those who share protected characteristics and those who do not
- To foster good relations between those protected groups

### Denbighshire's Strategic Equality Plan and Equality Objectives

Following extensive local engagement in partnership with the North Wales Equality Network, Denbighshire have adopted the seven equality objectives below. More detail on each of these objectives and additional information on our Equalities work can be found in our Strategic Equality Plan.

1. Reducing health inequalities
2. Reducing unequal outcomes in education to maximise individual potential
3. Reducing inequalities in employment and pay
4. Reducing inequalities in personal safety
5. Reducing inequalities in representation and voice
6. Reducing inequalities in access to information, services, buildings and the environment
7. Managing identified equality and fairness issues as part of our Business Planning and Performance Management Framework

In order to achieve these outcomes, relevant improvement activities, indicators and performance measures have been incorporated into our service plans.

## **The Corporate Plan and Equality**

As described above, our Strategic Equality Plan sets out our equality vision and directs the equality improvement work delivered by our services. The Corporate Plan sets out the council's overall improvement vision and priorities. This impact assessment has 'tested' the council's proposed priorities against the equality issues we have identified. It ensures that links between the Strategic Equality Plan and Corporate Plan are explicit and that our corporate priorities will be progressed in a way that eliminates discrimination, advances equality of opportunity and helps to foster good relations.

## **Consultation and Engagement**

Whilst developing our new Corporate Plan for 2012-2017, we undertook a considerable amount of consultation and engagement work, focusing on residents, staff, and Elected Members. The aim of this work was to help identify priorities to address the needs and concerns of our communities. Some of the key activities undertaken as part of our consultation and engagement work included:

- A residents' survey: of 6,000 households during the summer of 2011, that included questions about the biggest issues facing our communities.
- A public survey: through our website and by posting leaflets in our leisure centres, libraries, One-Stop-Shops and council reception areas. This took place between October and December 2011, and generated 1,228 responses.
- Workshops with young people: through the Denbighshire Youth Council and Student Councils in some of our high schools.
- Staff workshops: with different levels of staff throughout the council.
- Workshops with Elected Members: to consider the conclusions from our research and engagement work and agree draft priorities for our new Corporate Plan.
- Public consultation on draft Corporate Plan priorities: inviting comments from residents, staff, Town & Community Councils and other stakeholders during August and September 2011.

## **Equality Impact Assessment Research**

In the period since the development of the draft priorities we have been undertaking our Equality Impact Assessment. This has involved incorporating views and issues raised by:

<p><b>General</b></p> <p>Equality and Human Rights Commission (Wales and UK)</p> <p>The Bevan Foundation</p> <p>Welsh Government</p> <p>HM Government</p> <p>North Wales Public Sector Equality Network</p>	<p><b>Younger People</b></p> <p>Children's Commissioner for Wales</p> <p>NSPCC</p> <p>Living and Working in Denbighshire Research Project (14-19)</p> <p>Denbighshire Youth Council</p> <p>Ysgol Glan Cwyd, Denbigh and Prestatyn High School Student Councils</p>
<p><b>Older People</b></p> <p>Age Cymru and Age UK</p> <p>The Older Peoples Commissioner for Wales</p>	<p><b>Men</b></p> <p>GEM Project</p>
<p><b>Women</b></p> <p>The Fawcett Society</p> <p>Welsh Women's Aid</p> <p>WENWales</p>	<p><b>LGB People</b></p> <p>Stonewall Cymru and Stonewall UK</p>
<p><b>Disabled People</b></p> <p>Disability Wales</p> <p>Office for Disability Issues Denbighshire Self-Advocacy</p>	<p><b>Race</b></p> <p>Runnymede Trust</p>
<p><b>Trans People</b></p> <p>UNIQUE</p>	<p><b>Religion and Belief</b></p> <p>Human Rights and Social Justice Research Institute</p>

In order to support this Equality Impact Assessment, we have compiled reports by protected group and cross-cutting reports for a number of key topics:

### Protected Group Reports

- Older People
- Younger People
- Disabled People
- Trans People
- Women
- Pregnant Women
- Men
- LGB People
- Marriage and Civil Partnership
- Race
- Religion and Belief

### Topic Reports

- Equality and Education in Denbighshire

- Equality and the Economy in Denbighshire
- Equality and Social Services in Denbighshire

### **'Your Agenda' - On-going Engagement**

Before March 31 2013 we intend to have reviewed each protected group report with further input from local and national representatives of each group.

Throughout the life of the Corporate Plan we will carry out the 'Your Agenda' programme, which will provide a backdrop to planning and decision making across the Council. The programme will include the annual review of each protected group report produced with representatives and partners.

Finally we will consult on the design and implementation of individual proposals as part of Equality Impact Assessments of the detailed innovations we implement to deliver the plan.

## Developing the local economy and our communities

No.	Issue	Response	Next Steps
1.1	Economic inequality for women 1: Economic inactivity, unemployment and self-employment rates.	The council currently works in partnership to provide employment and opportunities for people with caring responsibilities (in many cases women) through the Genesis II project	Analyse the results of the Chwarae Teg study on available support for women and use this to inform the developing Economic and Community Development Priority.
1.2	Economic inequality for women 2: Pay and Earnings gaps and Occupational segregation (including in relation to apprentices).	As part of our commitments in the SEP we analyse Local Authority pay to enable the prevention of pay differences and provide a greater understanding of pay distribution in the council.	Consider the extent and nature of the role the council could play in influencing gender pay inequality and occupational segregation across the county
1.3	Pay gaps for disabled workers and some ethnic groups.	As part of our commitments in the SEP we also analyse Local Authority pay by race and disability protected characteristics to enable the prevention of pay differences and provide a greater understanding of pay distribution in the council.	Consider the extent and nature of the role the council could play in influencing race and disability related pay inequality and across the county.
1.4	Barriers to adult learning and training for disabled people and people with caring responsibilities.	The council currently works in partnership to provide training opportunities for people caring responsibilities through the Genesis II project and people with identified social care needs through the New Work Connections Programme	Monitor the success of the Genesis II Project and New Work Connections Programme and consider their impact on wider trends.
1.5	High levels of men and young people claiming job seekers allowance.	Our Education Service currently engages with young people at risk of becoming NEET (see 2.6).  The council engages in work with partners,	These issues will be given further consideration in the development of the Economic and Community Development Priority.

		particularly through the Rhyl City Strategy and Denbighshire Communities First, which aims at reducing unemployment and economic inactivity across all protected characteristics	
<b>1.6</b>	High levels of economic inactivity in the over 50s.	See above	This issue will be given further consideration in the development of the Economic and Community Development Priority.
<b>1.7</b>	Community Cohesion	The Big Plan (Denbighshire's Single Integrated Strategic Partnership Plan) commits a range of public, and third sector partners (including the Council) to Promote social inclusion and community cohesion, and value diversity and promote equality. We have recently worked together with neighbouring authorities to recruit a regional Community Cohesion Co-ordinator.	The newly appointed regional Community Cohesion Co-ordinator will lead discussions on priorities, and co-ordinate activity to promote community cohesion in Denbighshire.

## Improving school buildings and standards for all

No.	Issue	Response	Next Steps
2.1	Differing attendance records of different protected groups.	The national research identifies the differing attendance records of different protected groups. Denbighshire is yet to develop attendance monitoring by protected group, apart from for boys and girls where there is only a slight difference.	The Education and Customers & Education Support services will consider the benefits and practicality of disaggregating data further and monitoring by more protected groups.
2.2	Different protected groups being more likely to be excluded than others.	The national research identifies that some ethnic groups and boys are more likely to be excluded than other groups. They generally involve small numbers of pupils and the data is more robust when aggregated at national level. The small numbers of pupils from each ethnic group other than white present data disclosure issues for Denbighshire level data.	The Education and Customers & Education Support services will consider the benefits and practicality of disaggregating data further and monitoring by more protected groups.
2.3	Identity based bullying in schools and its impact on pupils well-being and attainment.	The Education and Customers & Education Support services have identified this issue in their service plans and as part of the SEP. They are in the process of implementing a new monitoring regime to tackle identity based bullying in Denbighshire schools.	The Education and Customers & Education Support services will examine the results of the new monitoring regime and respond to any significant trends.
2.4	Lower attainment levels among boys.	The Education and Customers & Education Support services have identified the issue of lower attainment of boys in their service plans and as part of the SEP. The Education service continues to support and	The Education and Customers & Education Support services will continue this work.

challenge schools in order to raise standards for all.

**2.5** Need for greater understanding of the trends in attainment of different ethnic groups and of pupils with ALN.

The Education and Customers & Education Support services identify this issue in their service plans and as part of the SEP. They are in the process of implementing a new monitoring regime to identify attainment trends for these protected groups.

The Education and Customers & Education Support services will examine the results of the new monitoring regime and respond to any significant trends.

**2.6** The need to continue to work to reduce the number of NEETs and pupils leaving without a qualification

The national research identifies a national trend of a greater proportion of males who are NEET and boys who leave without a qualification. The Education service works to the principal that no pupils should leave without a qualification and provides support to all groups.

The Education service will continue its work to engage with those pupils who are NEET, or in danger of becoming NEET, to provide all the support possible. The service will also continue its work to support and challenge schools to engage with pupils in danger of leaving without a qualification.



## Improving our roads

No.	Issue	Response	Next Steps
3.1	Quality of pavements, identified as a concern by older people as part of the community calculator report.	In many cases work to improve the pavement is undertaken at the same time as capital maintenance is conducted on that part of the highway. Following the adoption of the physical access objective in the SEP we have specifically concentrated on 'drop-curbs' to improve accessibility of pavements, as part of the Highways and Infrastructure Service plan.	The Highways and Infrastructure Service will consider the extent to which pavement quality is already incorporated into our long-term capital maintenance plans, and whether these plans are sufficiently flexible to reasonably address concerns about particular stretches of pavement.
3.2	Disabled people's organisations demands for 'a barrier free transport system, including all modes of transport'	We currently have plans to increase the number of accessible buses and have upgraded bus station and rail facilities, at Rhyl and Prestatyn, which have included accessibility benefits.	The Highways and Infrastructure Service will continue to work with local and regional partners to improve accessibility of buses and rail transport.

## Providing a clean environment

No.	Issue	Response	Next Steps
5.1	Older people have identified, through the Community Calculator, that a cleaner environment improves perceptions of safety.	The Council has long recognised the links between a good environment and perceptions of safety and has engaged in various enforcement activities against environmental crime and anti-social behaviour.	Our priority includes an increased emphasis on local pride and community involvement that we hope will ensure a cleaner environment and a more responsive approach to tackling environmental problems in public spaces.

## Protecting vulnerable people and ensuring they are able to live as independently as possible

No.	Issue	Response	Next Steps
4.1	High levels of Children in Need and mothers with mental health Issues identified in Denbighshire.	<p>We have developed a therapeutic team and work closely with Health in multiagency arrangements such as the Child and Adolescent Mental Health Service.</p> <p>Work with parents focuses on encouraging engagement with health and adult services.</p>	<p>This issue has been recognised in the development of the Children and Family Services Commissioning Strategy which will be launched in 2013. It will contain our proposals to extend the support for children and adult family members with mental health issues.</p>
4.2	The impact of domestic abuse on families.	<p>We work closely with local Women's organisations to deliver the Freedom Programme to victims of domestic abuse. A key role for the council is in helping victims to recognise problems and encouraging them to engage in change.</p> <p>We also carry out work with perpetrators see 4.5 below.</p>	<p>We will keep this work under review in light of changes to the legal definitions of domestic abuse currently being enacted by the UK government.</p>
4.3	Early intervention to prevent accumulated harm (older children developing more complex needs).	<p>Our Families First programme is our current focus in relation to early intervention in families.</p>	<p>We are currently investigating early intervention at further stages on the child protection spectrum including Children in Need and Looked After Children stages. We are shifting resources away from traditional solutions (for example children's homes) to services aimed at preventing escalation, including Extended Family Support, Support Foster Care and Emergency Foster Care provision.</p>
4.4	Higher levels experiencing coerced sexual activity among females (identified in national research).	<p>Protecting children from sexual exploitation is a key element of all safeguarding work.</p>	<p>We intend to further explore, in partnership with the West Rhyl Youth Project, some identified concerns and potential issues.</p>

<p><b>4.5</b> Gender Asymmetry in relation to perpetrators of severe maltreatment (identified in national research)</p>	<p>We work with partners to provide rehabilitative programmes for perpetrators of domestic abuse including both voluntary and compulsory (via court order) schemes.</p> <p>We also have a therapeutic service, which in some circumstances brings together both partners in domestic abuse cases, in an effort to change behaviours and reduce harm.</p>	<p>Our Children and family Services Commissioning Strategy 2013-16 will explore further options for work with perpetrators.</p>
<p><b>4.7</b> Differences by ethnic groups in the recorded 'main reason' for children being taken into care (identified in national research).</p>	<p>We have not found evidence of particular trends, by ethnic group, locally although we are aware of the findings of national research.</p>	<p>Where trends are identified we will consider appropriate responses.</p> <p>Anecdotal evidence suggests that there may be disproportionately few children from Welsh speaking families engaged with children and families services. We intend to investigate this possibility and potential causes.</p>
<p><b>4.8</b> Need for services to examine and respond to the recommendations of the disability harassment inquiry.</p>	<p>We participated in the inquiry including giving evidence on the Christopher Foulkes case.</p> <p>Our evidence included outlining improvements we had made, particularly in information sharing and transition arrangements between Children's and adults social services.</p>	<p>We will consider any further lessons to be drawn from the inquiry and its recommendations.</p>
<p><b>4.9</b> Concerns of older people's organisations about access to advocacy and levels of involvement and decision making in protection procedures.</p>	<p>We are currently reviewing the management and processes of our protection of vulnerable adults function and will take these concerns into account.</p>	<p>Implement revised management and processes.</p>

<p><b>4.10</b> Need to learn from the experience and recommendations of the inquiry into home care in England.</p>	<p>The council is aware of this inquiry, and has plans to consider the lessons during the current financial year.</p>	<p>This will be considered by the council during 2012-13.</p>
<p><b>4.11</b> Need to ensure that specific care needs of LGB people, Trans people, Ethnic Minorities and people with religion and or belief are considered, including their differing social needs.</p>	<p>We provide a fully updated Equality and Diversity Training package covering the protected characteristics and recent developments since the introduction of the Equality Act 2010. The training aims at enabling staff to take into account the diverse nature of individuals and ensure that they are treated fairly.</p> <p>We offer this training to independent sector employees and volunteers as well as our own staff.</p>	<p>We will continue to develop this training and to ensure that it brings positives benefits across the public sector and independent sector care workforce.</p>
<p><b>4.12</b> Disabled people's organisations demands for 'Improved access to information, advice, independent advocacy and peer support services for all'.</p>	<p>We have recently reviewed and updated our care directory which enables our first contact team to sign-post people to a range of provisions including care providers and also support groups and representative organisations.</p> <p>We provide funding for independent advocacy services and particularly promote this to people with Learning Disabilities. In addition we sign-post people to the advocacy services for older people supplied by Age concern and offer lower</p>	<p>We continue to offer the services as outlined.</p>

		level support to enable residents within care homes to articulate their concerns.	
<b>4.13</b>	Disabled people's organisations demands for 'A comprehensive range of options and genuine choice and control in how personalised care and support is delivered'.	We have already begun work to achieve this. The Adult and Business Service Plan contains two outcomes relating to personalisation focusing on 'Adults having Control and Choice over their Care' and that 'individuals have a reduced reliance on paid services'.	Develop these further through implementation of the priority.
<b>4.14</b>	Disabled people's organisations demands for 'Improved access to Person Centred Technology (aids & equipment)'.	Our Community Equipment Service (CESI), which is a formal partnership with the Betsi Cadwaladr University Health Board (BCU), provides and manages a wide range of equipment from hoists to Telecare to help people live independently within the community.	Continue to develop the CESI.
<b>4.15</b>	Disabled people's organisations demands for 'Enabling access, involvement and social, economic and cultural inclusion for all disabled people.'	'Community initiatives meet the needs of an increasing population of older and disabled people' has been a key outcome of our Corporate Plan over the last three years. Associated activities have included sports, social, computer literacy and employment and training initiatives.	In the Corporate plan we have pledged to work with local organisations to develop community based activities that help people to remain active and independent.
<b>4.16</b>	Need to ensure that residents of extra-care housing are able to access community activities	Denbighshire's model for Extra-Care housing places great emphasis on activities for residents and connectivity between the Extra-Care developments and the neighbouring facilities within the towns.	We will continue our series of 'Quality of Life' newsletters for each of the Extra-Care sites. These detail facilities, opportunities and activities in and around the Extra-Care sites, as well as providing an insight into the views of tenants.

**4.17** Perception that 'independence' agenda is more advanced for younger disabled people than for older people.

In Denbighshire we have prioritised independence for Older People, as well as for younger disabled people, in our Corporate Plan since 2009.

We continue to prioritise independence for all service users in our new Corporate Plan from 2012-17.

**4.18** Cautionary observations by Age UK regarding suitability of Direct Payments for some older people.

Choice is at the heart of our approach to care and we offer direct payments as one of several options for services users without pressure or prejudice.

We are currently revising guidance in relation to direct payments and are conducting a separate Equality Impact Assessment on this guidance as part of the review.

## Ensuring access to good quality housing

No.	Issue	Response	Next Steps
6.1	Disabled people's organisations demands for 'Availability of accessible and supported housing to meet individual requirements'.	<p>The Single Access Route to Housing group (SARTH) has already begun work on the access elements of this work including development of an adapted housing register.</p> <p>Delivery of disabled facilities grant is also relevant to this area of concern.</p>	We will ensure that disabled and older people's housing needs are understood and incorporated into our strategies for enabling the right mix of housing in the county.
6.2	Need to ensure that safety concerns of Trans people, LGB people and victims of domestic violence are recognised in the allocation process.	The Housing Allocation policy has been re-written in 2011-12 in response to the implementation of the Equality Act 2010.	We will monitor the implementation of the new allocations policy and consult with representatives of Trans people, LGB people and victims of domestic violence about its effectiveness and any remaining issues.
6.3	Need to ensure that hate crime and harassment in social housing settings is understood and tackled.	This year we have introduced monitoring of hate crime, harassment and domestic abuse reporting among council tenants.	The Housing and Community Development Service will examine the results of the new monitoring regime and respond to any significant trends.

## Modernising the Council to deliver efficiencies and improve services for our customers

No.	Issue	Response	Next Steps
7.1	Changes to transactions that may affect protected groups differently.	<p>Some already identified potential positive impacts include:</p> <ul style="list-style-type: none"> <li>• Opportunities to increase the amount of transitions available online. Trans people have highlighted that this would benefit them.</li> </ul>	Potential positive and negative consequences of any proposed changes will be discussed as part of separate equality impact assessments on each of the detailed proposals.
7.2	Changes to working patterns that may affect protected groups differently.	<p>Some already identified potential positive impacts include:</p> <ul style="list-style-type: none"> <li>• Opportunities for new flexible arrangements to enable workers to participate more easily in religious or belief related activities.</li> <li>• Opportunities for new flexible arrangements to benefit people with caring responsibilities, particularly benefiting women.</li> <li>• Opportunities for new flexible arrangements to enable men to increase their involvement in caring activities.</li> </ul>	Potential positive and negative consequences of any proposed changes will be discussed as part of separate equality impact assessments on each of the detailed proposals.