

# **London Borough of Camden – Cumulative impacts of the MTFs: Update and initial analysis**

10<sup>th</sup> July 2015

## **Summary of the Report:**

We have completed analysis of the cumulative impacts of MTFs proposals based on information available as of March 2015. The overall picture is reassuring. With the exception of projects in earlier stages of development, there is evidence that projects have been developed with reference to the investment test of tackling inequality and are developing EIAs which consider impacts against protected characteristics and mitigation activity.

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## 1.0 Background

- 1.1. In the December MTFS Cabinet report we made a commitment to share initial findings from the cumulative impacts analysis in July 2015.
- 1.2. The cumulative impact analyses impacts on residents. Impacts of MTFS proposals on the workforce are being considered separately.
- 1.3. Analysis of cumulative impacts does not replace the individual equality impact assessments (EIAs) already being undertaken by project teams; these EIAs contain much more granular and detailed analysis of impact for those with protected characteristics.
- 1.4. The work is not limited to analysis around the PSED protected characteristics but aims to build a more nuanced picture drawing on previous research including the Equality Taskforce<sup>1</sup> outputs and the cumulative impact research<sup>2</sup> undertaken by the Young Foundation.
- 1.5. It is important to note that this analysis differs from the Young Foundation cumulative impact research in three main ways:
  - it is forward looking rather than retrospective
  - it takes our savings programme as the starting point, before drawing in changes that may affect these groups in the wider public service landscape
  - it is at this stage a desk-based exercise
- 1.6. Drawing on the Young Foundation research we have chosen to assess impact on the following groups which the evidence tells us are particularly vulnerable to the effects of service cuts:
  - Low income families and individuals
  - Disability
  - Young people
  - Older people
- 1.7. The latter three groups link to protected characteristics under the Equality Act 2010. We have also ensured we consider the impact on all of the other protected characteristics as set out by the Equality Act 2010.
  - Race
  - Sex
  - Pregnancy and maternity
  - Sexuality
  - Gender Reassignment

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<sup>1</sup> <http://www.camden.gov.uk/ccm/content/community-and-living/your-local-community/equalities/twocolumn/camden-equality-taskforce/>

<sup>2</sup> <http://www.camden.gov.uk/ccm/content/community-and-living/your-local-community/equalities/twocolumn/camden-equality-taskforce/?page=5#section-5>

- Religion
- Marriage and Civil Partnership

1.8. We have also sought to highlight and identify areas where cumulative impact cuts across more than one protected characteristic. Our approach incorporates the principles behind the ‘triple lens’ approach adopted by the Equality Taskforce, which highlighted that a number of factors can contribute to a person facing inequality, across different life domains and the life course of the individual. This is illustrated in the diagram in Appendix A.

## **2.0 Legal context – Public Sector Equality Duty (PSED)**

2.1. Under the general duty of the Public Sector Equality Duty (PSED), we must in the exercise of our functions have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

2.2. The Equality Act explains that the second aim (advancing equality of opportunity) involves, in particular, having due regard to the need to:

- Remove or minimise disadvantages suffered by people due to their protected characteristics.
- Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

2.3. To comply with the general equality duty, a public authority needs to have due regard to all three of its aims.

2.4. The public sector equality duty (the equality duty) does not prevent public bodies from making difficult decisions such as reorganisations and relocations, redundancies, and service reductions, nor does it stop us from making decisions which may affect one group more than another group. The equality duty enables us to demonstrate that we are making financial decisions in a fair, transparent and accountable way, considering the needs and the rights of different members of our community. This is achieved through assessing the impact that changes to policies, procedures and practices could have on people with different protected characteristics<sup>3</sup>.

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<sup>3</sup> Making Fair Financial Decisions: Guidance for Decision Makers (EHRC, 3<sup>rd</sup> edition, 2015)  
<http://www.equalityhumanrights.com/publication/making-fair-financial-decisions-guidance-decision-makers>

- 2.5. Our corporate Equality Impact Assessment (EIA) process helps us to ensure that we pay due regard to the aims of the PSED during policy change and service transformation. The EIA process, if followed correctly, ensures we are considering equality issues throughout policy-making and implementation. It also enables us to deliver the appropriate information to the decision maker in a consistent way.
- 2.6. Consideration of equality should run through the policy formulation and implementation process. Decision makers must have the equality impacts (and mitigations) explained to them clearly, and have due regard to these impacts before making final decisions about whether to go ahead with a policy change.

### **3.0 Cumulative impact analysis – approach**

- 3.1. To produce the analysis we considered each proposal against an evidence base of key issues affecting each group and produced a shortlist for each. We discounted savings proposals that had no impact on residents (e.g. they are relating to internal, back office savings).
- 3.2. We then assessed each MTFS project impact, the combined impact with other MTFS projects and potential areas of cumulative impact including wider public service changes.
- 3.3. From this, we developed a summary overview analysis for each group, this also captured mitigation and that some projects were not sufficiently well developed to give any useful analysis of impact.

### **4.0 Outcomes of our analysis – overview commentary**

- 4.1. We have completed analysis of the cumulative impacts of MTFS proposals available as of March 2015. It is worth reiterating that these proposals are at different stages of development and are subject to change. The following section offers an overview of what the assessment is and is not able to tell us.
- 4.2. The overall picture is reassuring. With the exception of projects in earlier stages of development, there is evidence that projects have been developed with reference to the investment test of tackling inequality and are developing EIAs which consider impacts against protected characteristics and mitigation activity.
- 4.3. While there is at this stage no evidence to suggest that there will be pronounced, significant negative impact on those with protected characteristics as a result of MTFS projects, there may be limited impacts or areas where mitigation and experience of change from the service user perspective could usefully be monitored, especially given wider context of public service and welfare cuts. Access to advice and support emerges as a critical area across more than one of the groups we analysed, making the next steps from the systems thinking review of advice and support (which is currently in an early stage) critical. For example, for disabled people, welfare changes, including the transition from Disability Living Allowance to Personal Independence

Payment, and changes relating to Access to Work have the potential to exacerbate existing barriers and discrimination this group can face.

- 4.4. Because of a greater focus on the needs of the most vulnerable, there is evidence from the analysis of a range of areas where services will be improved through better targeting of resources, and in some cases, additional investment. For example, the crime reduction outcome aims to rationalise our approach to anti-social behaviour (ASB), ensuring resources are targeted at priority risk areas and vulnerable individuals where we know we can make an effective intervention. Investment in tackling domestic violence will target resources towards tackling a crime that impacts negatively on a range of residents who have at least one, and often multiple, protected characteristics.
- 4.5. This analysis shows that where potential negative impacts have been identified, they tend to be related to specific and limited issues, without crossover with other MTFS savings proposals. These issues are being assessed within individual EIAs, and are not restated here.

## **5.0 Analysis – key issues**

- 5.1. This section summarises key issues raised by group. These will be fed back into developing proposals, and incorporated into EIA development as relevant.
- 5.2. *Low income families and individuals*
  - Continued austerity (and for some customers welfare entitlement changes) will have ongoing impacts for this group
  - Stress resulting from unstable income or changes to benefit entitlement could lead to increased risk of family breakdown, mental health problems and impacts on children's resilience
  - Our advice and support offer will be especially critical to ensuring that customers negatively affected by welfare reform or experiencing financial difficulty get the help they need at the right time (this identifies the systems thinking review of advice and support as a key project)
  - The increasing shift to digital contact may impact where those on low incomes can be digitally excluded or where needs are complex and require referral to one or more services. There is a challenge in ensuring we share information effectively between services and signpost effectively, including where there are underlying needs that may not be the presenting problem or request.
  - Cuts to universal services could impact on people on low income, for example if they had to pay to travel to a service that is now further away (e.g. the developing library review). This could also impact on carers who might use these services as informal respite.
- 5.3. *Disability (including physical and learning disability)*
  - The process of service change itself is likely to have impacts for more vulnerable service users, so the support we provide to these service users during the transition will be essential.

- Continued austerity and for some individuals, welfare entitlement changes will have ongoing impacts for this group, particularly if they are also in a low income family (we know that families with either a disabled child or parent are much more likely to be negatively impacted by welfare reform).
- The shift to online services – especially via the Customer Access and First Contact (Personalisation) projects create some risk of confusion and disruption for more vulnerable service users. In particular, BME people who are disabled or have mental health needs risk being affected on multiple fronts by these changes.
- Changing our approach to managing Anti-Social Behaviour (ASB) could mean that there are cases of lower level ASB where we no longer intervene. This could affect vulnerable customers for whom this may be a source of stress and changes could increase feelings of isolation.
- Given the barriers to employment and discrimination experienced by many disabled people, the availability and accessibility of appropriate advice and support will be crucial (this is particularly relevant to the systems thinking review of advice and support)

#### 5.4. *Young people 16-25 (subset of age protected characteristic)*

- The proposals for youth service are in early stage but impacts for young people will be revisited as proposals develop.
- The careers and advice offer remains key to support young people's participation in education, training or employment, particularly in more vulnerable groups (see disability and BME).
- The effectiveness of advice and support will also be a pivotal safety net around housing, especially considering the possible removal of housing benefit for 18-21s proposed as part of government's welfare reform agenda.

#### 5.5. *Older people*

- As for other protected groups, the process of service transformation is likely to have impacts for more vulnerable service users, so the support we provide to these service users during the transition will be vital.
- The shift to online services, especially via Customer Access and First Contact (Personalisation) proposals may cause some confusion and disruption for more vulnerable service users, especially as many older people prefer to contact us face to face or by telephone
- Careful support will be required to ensure this does not result in failure to assess the root or complexity of reasons behind a contact.
- Changing our approach to managing Anti-Social Behaviour (ASB) could mean that there are cases of lower level ASB where we no longer intervene. This could affect vulnerable customers for whom lower level ASB is a source of stress and potentially contribute to feelings of isolation.

- Much of the transformation is aimed at helping older people stay independent, resilient and connected in their communities, while still supporting the most vulnerable. Support in transition will be especially focussed on residents who may have been used to accessing more traditional service provision (such as day services).

#### 5.6. *Race/BME*

- There are crossovers with other protected characteristics and vulnerabilities for this group, especially disability and low income families/individuals.
- As mentioned in previous sections the shift to digital will encourage more people to self-serve online, which has the potential to impact on BME groups with language barriers or who are digitally excluded.
- BME residents who have mental health needs or who are disabled are more at risk of isolation from services; project transition will require careful mitigation to avoid further isolating this group.
- Given higher rate of BME unemployment 18-24, any changes to advice and support provision linked to systems thinking review of advice provision may impact on this group.

#### 5.7. *Sex*

- The analysis has not uncovered any evidence to suggest that projects will cumulatively impact on one sex more than another (taking sex as a protected characteristic in isolation). However, there are intersections with other protected characteristics.
- For example, women on low incomes with children will experience changes as a result of a number of projects, including the new approach that will be developed to early years by Camden Sure Start and the updated housing allocation policy. However, both of these projects aim to improve services and target resources towards low income families, especially single parents.

#### 5.8. *Pregnancy and maternity*

- Few and minimal impacts across OBB projects and no cumulative impacts anticipated.

#### 5.9. *Sexual orientation*

- Few impacts identified across OBB projects. Projects that may impact on this group are mainly linked to prejudice and discrimination. This could manifest itself in hate crime or domestic abuse (the latter is often a 'hidden' issue amongst LGB people) which can have a knock-on impact on wellbeing.

#### 5.10. *Gender reassignment*

- The potential impact areas are the same as those identified for the sexual orientation protected characteristic.

5.11. *Religion or belief*

- Few impacts identified across OBB projects. Majority of relevant projects linked to the crime reduction projects – where being a victim of hate crime is more likely for some faiths.

5.12. *Marriage and civil partnership*

- No MTFS projects will impact on this group.

## **6.0 Next steps**

### *Mitigation*

6.1. This work will help inform emerging MTFS project plans and EIAs.

6.2. The resilience outcome stream is seeking to understand ways in which we might build on local assets and increase resilience in the community and this analysis will inform this work.

### *Interaction with public services and local partnerships*

6.3. The current analysis takes our MTFS proposals as starting point. We will be looking to discuss cumulative impacts with partners at the appropriate time and when more detail is available.

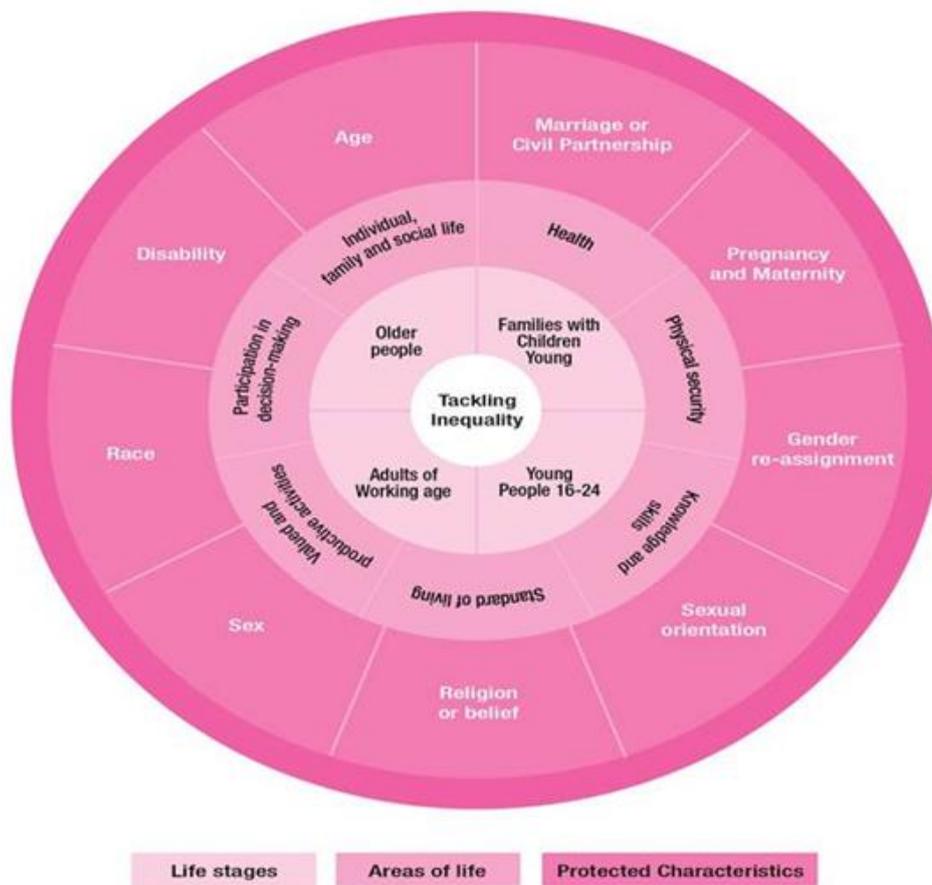
### *Ongoing analysis*

6.4. We have noted that it was not possible to include some MTFS proposals in this analysis because of their stage of development. There will be no fixed stage at which we can produce a 'final' analysis, though we will refresh our assessment as the projects develop through the lifetime of the MTFS.

REPORT ENDS

## Appendix A: Triple lens approach

This work is also built on the ‘triple lens’ approach adopted by the Equality Taskforce. This approach recognises that it is not possible to fully understand the issues people face when looking at their lives through the narrow lens of protected characteristics alone. It highlights that a number of factors can contribute to a person facing inequality, across different life domains<sup>4</sup> and the life course. This is illustrated in the diagram below:



The rationale for utilising this analytical framework and previous research was to provide some level of continuity with the work the council has previously commissioned on this subject. We have sought to make the most of the evidence we have available to us, and to provide a structure and focus to a complex exercise. Although we have chosen to focus our analysis on specific groups, we have referenced intersectionality between the groups identified as well as to specific equality characteristics.

<sup>4</sup> These include: to live in safety and security; to be healthy; to be knowledgeable and to have the skills to participate in society; to enjoy a comfortable standard of living, with independence and security; to engage in productive and valued activities; to enjoy individual, family and social life; to participate in decision-making, have a voice and influence.