

Equality and Consultation Analysis Template (ECA) – Appendix C

Guidance for completion

- Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act 2010, during the Council's decision making processes. These processes are:
 - Cabinet/Cabinet Member reports
 - Fundamental Service Reviews
 - Policy and Strategy Development
 - Human Resource Policies
 - Commissioning & Procurement
 - Other Service Reviews/Restructures
- These 'protected groups' are those defined by race, age, gender, disability, sexual orientation, gender reassignment, religion or belief, pregnancy, maternity or breastfeeding and vulnerable communities for example Looked After Children, Homeless etc
- Remember to think about children and young people as a specific group that you may need to consider the impact on and engage with during this analysis.
- Equality analysis will help you to consider whether the decision you want to take:
 - Will have unintended consequences for some groups
 - If the service or policy will be fully effective for all target groups
- The Council also has a statutory duty to consult
- This ECA template will enable the Council to demonstrate how equality information and the findings from consultation with protected groups and others, have been used to understand the actual or potential effect of your service or policy on the protected groups and to inform decisions taken. Hence, it is an evidence trail to show how the Council has met statutory equality and consultation duties
- The template should summarise key issues arising from information that has been collected, analysed and included in other key documents eg. Needs Analysis, Baseline Reports etc
- This form should be completed on an on-going basis at each stage of any formal decision making process. Failure to comply with this will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review.
- The Council also has a statutory duty to consider social value (Social, Economic and Environmental) when commissioning and procuring services
- A simple guide to statutory consultation and equality duties sets out what the Council needs to do to comply with the **equality and consultation duties** and will help to deliver the best possible outcome for the City Council and its stakeholders. This can be found on http://beacon.coventry.gov.uk/downloads/download/507/simple_guide_to_statutory_consultation_and_equality_duties

For further help and support please contact Helen Shankster on 7683 4371 (Consultation Advice), Sheila Bates on 7683 1432 (CLYP Consultation Advice), Jaspal Mann 7683 3112 (Equalities Advice) Mick Burn 0247683 3757 (Social Value Advice).

Equality and Consultation Analysis

Context

Name of Review	Passport to Leisure and Learning
Service Manager	David Nuttall
Officer completing analysis	Faye Cockayne
Date	September 2016

Scoping area of work

1. Briefly describe the area of work this analysis relates to:

The Passport to Leisure and Learning (PTLL) scheme is a concession scheme primarily for Coventry residents who are eligible for a means tested benefit. The aim of the scheme is to increase accessibility and encourage participation in learning and leisure opportunities across the Coventry.

The current take up of the PTLL scheme is extremely low, with only 1,548 cards in circulation and valid. Consultation on the PTLL scheme, which took place in 2013 indicated that the current application and renewal system is expensive, outdated and bureaucratic. The process involves completing a lengthy manual application/renewal form and providing suitable identification alongside eligibility/benefit verification.

The Council cannot currently quantify how many residents in the city would be eligible for the PTLL scheme, due to Data protection rules within the Department of Works and Pensions (DWP).

There are 34,607 homes in the city that are in receipt of either a Housing Benefit or Council Tax Support payment via the Council's internal Benefits and Revenues team. Housing Tax benefit and Council Tax Support that meet the eligibility criteria for PTLL scheme. The Council are recommending targeting these 34,607 homes as part of a re-launch of the scheme.

Coventry residents on other qualifying benefits which are registered with the DWP will be able to apply for the PTLL card through an online application process.

Public Sector Equality Duty

2. Which, if any, parts of the general equality duty is the service relevant to?
Please mark with an 'X'

	Eliminate discrimination, harassment and victimisation
X	Advance equality of opportunity between people who share relevant protected characteristics and those who do not
	Foster good relations between people who share relevant protected characteristics and those who do not

Gathering Information and Data

3. Who are the key groups that could be impacted by this work/service, including service users both existing and potential and stakeholders?
- Those in receipt of benefits
 - The children of those in receipt of benefits
 - Looked after Children
- 4.
5. From the list above, which of these constitute protected groups or vulnerable communities (e.g. those experiencing deprivation)?

All those listed above, including those who access disability benefit.

6. Which of the key protected groups and stakeholders representatives will need to be kept informed, consulted or actively involved in this area of work?

Key Stakeholder	*Type of Involvement	Method(s) used
Participating sports centres	Consult/involve	One to one discussions using results of the consultation
Adult Education	Consult/involve	One to one discussions using results of the consultation
Participating cultural venues	Consult/involve	One to one discussions using results of the consultation
Those in receipt of benefits	Inform	Initially through consultation and then via methods included in comms plan
The children of those in receipt of benefits	Inform	Initially through consultation and then via methods included in

		comms plan
Looked after children	Inform	Initially through consultation and then via methods included in comms plan
Asylum seekers	Inform	Initially through consultation and then via methods included in comms plan
Young people aged 16-19 in full time education	Inform	Initially through consultation and then via methods included in comms plan

* *Information, Consultation or Involvement*

Analysis

7. What information is currently available to be used as part of this analysis including data on current and potential service user, workforce etc?

- Housing benefit and council tax support data
- Other benefit recipients via DWP
- Number of looked after children
- Number of asylum seekers
- Number of young people aged 16-19 in full time education
- Results of consultation

8. What are the information gaps?

Due to data protection issues we are unable to directly access benefit recipient's information

9. How are you going to address the gaps?

Giving information to the DWP to share
Use social media/e-comms
Promotional launch period

Summary of Data

10. Please provide a summary of what the data is telling you and what key issues the data is telling you.

Current uptake of the PTTL card is very low, with 1500 cards currently in use, the total eligible population in Coventry is estimated at around 70,000 residents.

Housing Benefit or Council Tax Support data provided by the Council's internal Benefits and Revenues team has identified 36,000 homes that would meet the qualifying criteria for the PTLL scheme. All of the remaining qualifying benefits are

managed by the Department for Work and Pensions (DWP), due to data protection the Council cannot access information on which residents are claiming any means tested benefit managed by DWP.

The current application process for eligible residents requires the completion of a printed application form, proof of eligibility, photographic identification document and a passport style photo that is included on the PTL card for identification purposes.

The current charge for a PTL card is £5.20 for an adult and £2.60 for a child. Non-residents can apply for a card the same eligibility criteria apply but charges increase to £16.30 for an adult and £8.15 for a child.

Generating and evaluating options

11. What are the different options being proposed to stakeholders?

- Do nothing
- On- line Application process
- Recommended Proposal – directly sending cards to those eligible where possible with related focused promotion

12. How will the options impact protected groups or vulnerable groups e.g. those experiencing deprivation?

- Option one – do nothing

Increased take up is unlikely to happen, nothing changes for protected or vulnerable groups, and the status quo is maintained.

- Option two – on-line application process

There is likely to be some increased take up of the scheme by protected and vulnerable groups.

- Option three – directly sending cards to those eligible where possible with related focussed promotion

It is expected that this will see the highest increase in take up of the scheme. Results of the consultation suggested that eligible people are put off by the application process, initial cost and yearly renewal. By sending the card free of charge to those eligible these barriers are greatly reduced.

13. Please detail how you could mitigate any negative impacts

There are no perceived negative impacts through the proposed option (option three).

14. Identify which stakeholders would be positively/negatively affected by the options (consider contractors/service users/employees).

All stakeholders would be positively impacted by the preferred options. The venues through increased use and a more diverse client base, and those in receipt of benefits, their children and looked after children through better access to sport, learning and cultural activities.

Formal Consultation

15. Who took part in the consultation? Please also specify representatives of any protected groups for example service users, employees, partners etc.

826 people responded to the consultation which took place in 2013. The map below shows where respondents live.



The percentages given below are expressed as a proportion of the number of respondents who answered the question and not as a proportion of the total number of respondents (823).

Age	
Under 16	2.3%
16 - 24	7.9%
25 - 34	16.5%

35 - 44	21.2%
45 - 54	20.5%
55 - 64	16.3%
65 - 74	11.3%
75 - 84	4.1%
85+	0.0%

Gender	
Male	33.5%
Female	66.5%

Ethnicity	
White English / Welsh / Scottish / Northern Irish / British	81.1%
White Irish	2.3%
White Gypsy or Irish Traveller	0.1%
Any other White background	3.0%
Mixed White and Black Caribbean	0.4%
Mixed White and Black African	0.1%
Mixed White and Asian	0.1%
Any other Mixed/ multiple ethnic background	0.0%
Asian Indian	4.0%
Asian Pakistani	1.9%
Asian Bangladeshi	0.3%
Chinese	0.1%
Any other Asian background	1.9%
Black African	1.7%
Black Caribbean	1.3%
Any other Black/ African/ Caribbean/ background	0.3%
Arab	0.1%
Any other ethnic group	1.0%

Disability	
Yes	35.0%
No	65.0%

16. Are there any protected groups that you have not consulted with? If so, why not?(Some groups might not be relevant)

Sexual orientation, gender reassignment, pregnancy, maternity or breastfeeding where not relevant. Looked after children were not specifically targeted in the consultation, but discussions with relevant officers has taken place since then.

17. What are the key findings of the consultation?

- In terms of the specific discounts that respondents said encouraged them to get a Passport to Leisure and Learning Card, the Sports and Parks discounts received the highest response – it is also the most used discount, followed by Adult Education related discounts. Culture discounts proved to be the least encouraging and are also the least used; however, they are still used by over 1 in 4 respondents.
- Almost a third of respondents said they use their card once or twice a week to claim a discount and a quarter said they use it this amount per month. A very low number said they never use it (1.7%).
- There was a very clear message that the PTLL scheme is not well advertised and a number of advertising/ promotional methods were suggested including; posters, leaflets, newspaper adverts and email alerts.
- There was particular reference to the signing up and renewal processes in that they are too long, complicated and bureaucratic. It was also mentioned that too much paper work is required as suitable identification. Respondents also expressed their dissatisfaction with the fact that the PTLL only lasts a year and that it is too expensive to keep renewing it and the costs to update the required photographs. Respondents suggested a reminder system so that members are alerted to the fact that their card is due to expire. This was a contributing factor to the high level of respondents that said they didn't have a card (59.0%).
- It was also suggested that the eligibility criteria for the scheme is extended so that not just people on benefits are entitled to it. A number of respondents suggested that over 60s should be included in the eligibility criteria.
- Almost two fifths of respondents said that they hadn't renewed or had never had a Passport to Leisure and Learning Card because they were not eligible and a quarter said that they were not aware of it. When asked what their 'Other' reasons were, respondents reinforced that it was due to these reasons and that the card is too expensive to renew and the activities are too expensive.

(Click and type here)

18. Following the consultation, what additional equality issues have emerged (if any)?

None

19. Have any of the options, service models etc changed following consultation? If so, please provide details of the changes made:

- The card is no longer issued at the Post Office and is now issued at a number of venues across the city

Equality Impact of Final Option

20. Please confirm below which option has been chosen for implementation.

Option three will be recommended to Members for their final decision.

21. Following consultation, please indicate which of the following best describes the equality impact of this analysis.

There will be no equality impact if the proposed option is implemented.

There will be positive equality impact if the proposed option is implemented.

There will be negative equality impact if the preferred option is implemented, but this can be objectively justified. Please state clearly what this justification is and what steps will be taken to ameliorate the negative impact.

22. How will the changes be monitored for equalities over the next 6 – 12 months?

- Number of new cards sent out
- Number of new cards used
- Number of repeat visits on individual cards
- Number of new cards applied for online

23. What is any will be the impact on the workforce following implementation of the final option? Please make reference to the relevant equality groups (as protected under the Equality Act).

None

Social Value

24. Please state how the social value outcomes have been considered in making this decision.

- Card issuing managed by key stakeholders rather than private company
- Local people have better access to many services
- Local people are able to improve their health and well being
- Promotion of social integration

Formal decision-making process

Please detail below the committees, boards or panels that have considered this analysis.

Name	Date	Chair	Decision taken

Approval

Approval required from Director and Cabinet Member

Director Name	Signature	Date
David Cockroft		

Cabinet Member Name	Portfolio	Approval Date
Cllr Caan		

**Note: Failure to comply with duties on equalities and consultation will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review.*

Monitoring and Review

This section should be completed 6-12 months after implementation

- a) Please summarise below the most up to date monitoring information for the newly implemented service, by reference to relevant protected groups.

(Click and type here)

- b) What has been the actual equality impact on service users following implementation?

Analyse current data relating to the service and think about the impact on key protected groups: race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, gender reassignment.

It may help to answer the following questions: Since implementation

- Have there been any areas of low or high take-up by different groups of people?
- Has the newly implemented service affect different groups disproportionately?
- Is the new service disadvantaging people from a particular group?

- Is any part of the new service discriminating unlawfully?
- c) What have been the actual equality impacts on the workforce since implementation?

(Click and type here)

Please send a copy of the completed form to your Directorate Corporate Equality Officer and a copy to the Corporate Equalities Team, Room 66, Council House, Earl Street, Coventry CV1 5RR.