

MAYOR'S EXECUTIVE DECISION MAKING

Monday, 21 September 2015

Mayor's Decision Log No. 112


**1. REDUCING FREQUENCY OF EAST END LIFE TO FORTNIGHTLY
(Pages 1 - 20)**

If you require any further information relating to this meeting, would like to request a large print, Braille or audio version of this document, or would like to discuss access arrangements or any other special requirements, please contact: John S. Williams, Service Head, Democratic Services

Tel: 0207 364 4204, e-mail: johns.williams@towerhamlets.gov.uk

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Agenda Item 1

Individual Mayoral Decision Proforma Decision Log No: <u>112</u>	 TOWER HAMLETS
Report of: Stephen Halsey, Head of Paid Service	Classification: Unrestricted
Reducing frequency of East End Life to fortnightly	

Is this a Key Decision?	No
Decision Notice Publication Date:	N/A
General Exception or Urgency Notice published?	N/A
Restrictions:	N/A

EXECUTIVE SUMMARY

The Council is undertaking a full review of its communications approach to be completed by March 2016 to ensure that it is compliant with the Code of Recommended Practice on Local Authority Publicity. Prior to completion and implementation of this review, this report sets out proposals to reduce the frequency of East End Life to fortnightly to enable resources to be directed to developing alternative communication approaches which meet the Council's key priorities.

Full details of the decision sought, including setting out the reasons for the recommendations and/or all the options put forward; other options considered; background information; the comments of the Chief Finance Officer; the concurrent report of the Head of Legal Services; implications for One Tower Hamlets; Risk Assessment; Background Documents; and other relevant matters are set out in the attached report.

DECISION

1. That the publication of East End Life reduces to fortnightly from January 2016 pending a full review of the Council's communications approach.

APPROVALS

1. (If applicable) Corporate Director proposing the decision or his/her deputy

I approve the attached report and proposed decision above for submission to the Mayor.

Signed  Date 18/9/15

2. Chief Finance Officer or his/her deputy

I have been consulted on the content of the attached report which includes my comments.

Signed  Date 18/9/15

3. Monitoring Officer or his/her deputy

I have been consulted on the content of the attached report which includes my comments.

(For Key Decision only – delete as applicable)


I confirm that this decision:-


(a) has been published in advance on the Council's Forward Plan OR
(b) is urgent and subject to the 'General Exception' or 'Special Urgency' provision at paragraph 18 or 19 respectively of the Access to Information Procedure Rules.

Signed  Date 18/09/15

4. Mayor

I agree the decision proposed in paragraph above for the reasons set out in section 1 in the attached report.

Signed  Date 21/9/2015

<p style="text-align: center;">Individual Mayoral Decision</p> <p style="text-align: center;">September 18 2015</p>	
<p>Report of: Stephen Halsey, Head of Paid Service</p>	<p>Classification: Unrestricted</p>
<p>Reducing frequency of East End Life to fortnightly</p>	

Lead Member	Mayor John Biggs
Originating Officer(s)	Louise Russell, Service Head, Strategy and Equality
Wards affected	All
Key Decision?	No
Community Plan Theme	One Tower Hamlets

Executive Summary

The Council is undertaking a full review of its communications approach to be completed by March 2016 to ensure that it is compliant with the Code of Recommended Practice on Local Authority Publicity. Prior to completion and implementation of this review, this report sets out proposals to reduce the frequency of East End Life to fortnightly to enable resources to be directed to developing alternative communication approaches which meet the Council's key priorities.

Recommendations:

The Mayor is recommended to:

1. Agree that publication of East End Life reduce to fortnightly from January 2016 pending a full review of the Council's communications approach.

1. REASONS FOR THE DECISIONS

- 1.1 The council is looking at new ways to communicate with its residents and to move more of its communications to digital methods in line with its digital communications strategy. To inform this a review of communications has been commissioned to consider the best way of communicating with local people to provide access to information and to promote equality and cohesion. Informed by the findings of this review, the council will ensure that it is fully compliant with the Code of Recommended Practice on Local Authority Publicity by March 2016. As a step towards this and to free capacity to develop alternative and digital approaches, it is proposed that publication of East End Life reduces from weekly to fortnightly.

2. ALTERNATIVE OPTIONS

- 2.1 An alternative is to retain weekly publication whilst developing digital solutions. This would limit capacity to develop the alternatives and not encourage channel shift by readers.
- 2.2 A further alternative is to further reduce frequency to monthly or quarterly prior to the review being completed. This would not appear to offer value for money for the council in terms of enabling publication of public notices. If statutory expectations in relation to publishing notices are changed in the future, this option will need to be revisited.
- 2.3 Lastly there could be an immediate reduction in publication in the interim period but this would have significant financial implications; the overall cost of doing so would potentially approach £200,000. This is because three month's notice is required to be given to the printers to introduce fortnightly printing and a penalty would be payable if this was shortened, and to this sum would be added a sum of at least £20,000 monthly in lost advertising revenue, which would not be mitigated by savings on print costs.

3. DETAILS OF REPORT

- 3.1 Tower Hamlets Council has taken steps to ensure that East End Life, along with all its other publicity, complies with the Code of Recommended Practice on Local Authority Publicity. In order to ensure compliance, and as a key part of its Communications Strategy, the council has an agreed Communications Protocol as well as specific Media and Branding guidelines and a Media Protocol. In addition, the Communications Service follows established protocols (including an editorial policy and advertising code) to ensure that political neutrality in East End Life is maintained. All of the Council's communications activity is kept under review with regular reports to the Corporate Management Team and Directorate Management Teams.
- 3.2 Since his election, the Mayor's policy has been to further encourage an even handed editorial approach to East End Life and opposition group leaders within the Council are being offered the opportunity for regular columns.

- 3.3 The Council has recently reviewed its approach to Council publicity as part of the Best Value Plan agreed with the Secretary of State's Commissioners to ensure it complies with the seven principles of the Code, i.e. to:
- Be lawful
 - Be cost effective
 - Be objective
 - Be even handed
 - Be appropriate
 - Have regard to equality & diversity
 - Be issued with care during periods of heightened sensitivity
- 3.4 The outstanding issue in relation to the Code and East End Life is paragraph 28 of the Code, which states that no local authority publication should publish more frequently than quarterly, with the exception of parish councils. The former Secretary of State wrote to Tower Hamlets Council to advise he was minded to issue directions to require the Council to comply with the issue of frequency as outlined in the Code. The Council responded to this justifying its position on a number of grounds including best value and promoting community cohesion. To date, this direction has not been issued. Directions have been issued to LB Greenwich in relation to its weekly publication and these are currently subject to Judicial Review challenge by LB Greenwich and it is understood that this case is likely to be considered early in 2016.
- 3.5 The council's current vision, developed in its Community Plan 2015, is to improve the quality of life for everyone who lives and works in the borough by tackling inequality, strengthening cohesion and building community leadership. East End Life has been considered key to the Council's ability to promote its Community Plan objectives widely to both residents and stakeholders. All of the Council's communications activity can be related back to the Council's overarching Community Plan themes (which were developed in consultation with local people) and these themes are reflected in the approach of East End Life to the provision of information and news to local people.
- 3.6 East End Life provides regular and reliable information about the Council, its services and its work plus the work of its partners. It regularly promotes health messages through a regular public health column, plus advice on welfare reform and benefits and the work of housing associations.
- 3.7 The specific characteristics of the population of Tower Hamlets present a particular challenge in terms of effective communications and continuous and meaningful engagement. The borough's population is the fastest growing in England and Wales (ONS Census 2011). It is also highly mobile (with a population churn of 12 per cent each year), young (24 per cent of the population is under 20) and diverse (32 per cent of residents are of Bangladeshi origin, 31 per cent are White British, 23 per cent are other non-white minority ethnic and 14 per cent non-British white minority ethnic). Over a

hundred languages are spoken by children attending the borough's schools. It is also one of the poorest boroughs in the country with over half of the borough's children living in poverty. Within this context, the role of East End Life in promoting the council's Community Plan objectives and, in particular, meeting the council's statutory duty to promote equality, is significant.

- 3.8 Against this background it is recognised that the way in which people get their information is changing. The Council has recently adopted a Digital Communications Strategy and the action plan is being delivered with a key aspect, the introduction of a new more interactive website, due to be completed by the end of 2015. Digital engagement is growing - 86 per cent of adults have access to the internet, however, these levels of access are strongly related to age. Only 38 per cent of those aged over 60 and 74 per cent of those aged 50 – 59 have internet access. Many of the groups most likely to read East End Life (older residents, those living in social housing and Bangladeshi residents) are the same groups who are least likely to favour online methods of contact with the council (Annual Residents Survey 2015). The Council also has a Digital Inclusion strategy which is seeking to increase online access and skills to these more excluded groups.
- 3.9 The Mayor earlier in the Summer requested a review of an options paper on the future of East End Life which analysed the financial consequences, so far as they can be known, of reduced frequencies of production. He then requested a full communications review, the outcome of which is awaited. The external review has been commissioned to explore a range of alternative methods of communicating with local people, including moving more communication online and digitally. The review will be informed by the views of local people.
- 3.10 Having regard to the Code and the review it is proposed that in the interim the publication of East End Life moves to fortnightly from January 2015 and that this be achieved by serving three month's notice as per the requirements in the contract. This reduction will free up capacity to develop alternative options and move more communications activity online. A reduced frequency will also be used to encourage channel shift amongst readers – eg advising and encouraging readers to look online for information in the 'off-weeks' for East End Life. The key role of East End Life in promoting the Council's Community Plan and meeting its equality duty will not be undermined by a move to fortnightly as the key messages and information within the publication are such that they would still reach local people in a timely fashion on a fortnightly basis.
- 3.11 At this time, a key purpose of East End Life is to ensure the council cost-effectively delivers its statutory duties in relation to public notices. East End Life is currently the most cost effective method of reaching the widest audience. Publication less frequently than fortnightly will not fulfil statutory requirements in relation to the majority of public notices. The Government launched a pilot scheme earlier this year looking at alternative ways of publishing public notices, including online. The pilot scheme is due to complete later this year and, depending on the outcomes of the pilot, may

lead to changes in the statutory requirements. However, such a change will require changes to existing legislation which will take time and are likely to be subject to consultation. The wider review will need to consider the implications if such changes are proposed.

- 3.12 The wider review of how the Council most effectively communicates and engages with its residents and complies fully with the Code of Recommended Practice on Local Authority Publicity will be reported later this year, enabling the council to take a longer term decision about its communications strategy and to implement changes to ensure it is code compliant by April 2016.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 This report seeks a mayoral decision to move the publication of East End Life from weekly to fortnightly with effect from January 2016 to the end of the current review into the paper, which is expected to conclude by March 2016.
- 4.2 The current budget for East End Life is £1.19m with budgeted advertising income of £1.2m.
- 4.3 Expenditure levels are not expected to change significantly during this period as current staffing arrangements will remain until after the review. Any potential reductions in other related areas are not expected to yield significant immediate savings. Any savings that do materialise will be used mitigate the potential revenue loss from reduced advertising income.
- 4.4 It is estimated that revenue from advertising income could reduce by £20k-£25k per month if the publication moves to fortnightly, and this will not be fully compensated by any reductions in print and distribution costs. The Council will seek to maximise advertising revenue during the transition period to manage the impact on the budget in 2015/16.
- 4.5 Staffing levels will be reviewed in the interim period to minimise costs and any spare capacity will be redirected to developing digital alternatives and implementation of new arrangements following the conclusion of the wider review about the future focus and requirements of our communications approach. Revised staffing arrangements are being considered with effect from April 2016 to coincide with the new approach.
- 4.6 The financial implications of any new approach implemented from April 2016 will need to be considered within the context of the council's challenging budget position and the need for savings.

5. LEGAL COMMENTS

5.1 Under the Local Government Act 1986 ('the 1986 Act') the Secretary of State has powers to issue a Code of Practice in relation to Local Authority publicity. The most recent version of the Code of Practice on Local Authority Publicity was issued in 2011. The Local Audit and Accountability Act 2014 amended the 1986 Act enabling the Secretary of State to issue Directions to a Local Authority for non- compliance with the Code. Where a Council considers the decision by the Secretary of State's decision to be Wednesbury unreasonable, procedurally flawed, or otherwise unlawful the Council may challenge the decision in the Court by way of Judicial Review of the Secretary of State's decision.

5.2 The Code addresses a variety of Local Authority publicity issues including that it should be cost effective and have regard to equality and diversity. It also provides that

28. Local authorities should not publish or incur expenditure in commissioning in hard copy or on any website, newsletters, newssheets or similar communications which seek to emulate commercial newspapers in style or content. Where local authorities do commission or publish newsletters, newssheets or similar communications, they should not issue them more frequently than quarterly, apart from parish councils which should not issue them more frequently than monthly. Such communications should not include material other than information for the public about the business, services and amenities of the council or other local service providers.

5.3 During the course of 2014 the Secretary of State formally wrote to a number of Councils giving them notice in writing of proposed directions which primarily related to frequency of publication of their newsletters. Letters proposing directions were also sent to 3 of those Councils again in March 2015. This Council received a notice on 16th April 2014 in which the Secretary of State proposed a direction that the Council comply with all the provisions in the Code. A detailed written response was sent from the Council to the Secretary of State. Having considered the Council's representations the Secretary of State wrote to the Council again on 24th September 2014 with revised proposed directions including requiring compliance with paragraph 28 of the Code cited above. Again the Council responded. No further action was taken by the Secretary of State under the 1986 Act. In March 2015 the Secretary of State issued final Directions under the 1986 Act requiring the Royal Borough of Greenwich to reduce their weekly publication to a quarterly basis. It is understood that judicial review proceedings were issued by Greenwich and the case is to be heard at the beginning of 2016.

5.4 Under the Secretary of State Directions dated 17th December 2014 made pursuant to section 15 of the Local Government Act 1999 in respect of the best value duties, the following action was required to be taken by the Council 'Within 3 months from the date of these Directions, to prepare a fully costed plan for the Authority's proper use of publicity and agree that plan

with the Commissioners; thereafter during the Direction Period, to report to the Commissioners on the delivery of that plan at 6 monthly intervals or at such intervals as the Commissioners may direct, and adopt any recommendation of the Commissioners in respect to that plan and for the Direction Period to adopt any recommendations of the Commissioners in respect to 'publicity more generally'. The council's Best Value Action Plan agreed with the Commissioners in response to the December 2014 Directions includes plans to review the Council's East End Life publication including a value for money assessment and considering options for alternatives including revised frequency of publication.

- 5.5 The Council is obliged as a best value authority under section 3 of the Local Government Act 1999 to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (the Best Value Duty). This is more particularly addressed in paragraph 7.1 below.
- 5.6 Under Section 149 of the Equality Act 2010 the Council in exercising its functions, which includes decisions about publicity, has a duty to have due regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Protected characteristics are defined in the Equality Act as age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. The report and attached Equality Impact Assessment set out in detail how the Council's duty is continued to met by the proposed reduction in publication frequency and by the other methods of publicity available from the council including information provided on line.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 East End Life has played a key role in promoting the council's equality duty and One Tower Hamlets aspirations. An equality impact assessment in respect of this decision has been undertaken and is attached.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 This decision ensures the council considers the best value implications of its communications approach and builds on the Communications action plan within our Best Value Action Plan.
- 7.2 Best Value is reflected in the decision to give three months' notice to contractors rather than implementing this decision immediately.
- 7.3 Although there will be some costs to the council in pursuing a fortnightly option during the interim period from January 2016, these will be part of a managed transition which enables staff resources to be deployed in

developing alternative approaches to communication. The review will seek the views of local residents and other stakeholders..

8. RISK MANAGEMENT IMPLICATIONS

8.1 There are some risks with this approach – these and the proposed mitigations are set out below.

Issue	Mitigation
There are current contracts for print and distribution with penalty clauses for termination with less than 3 months notice in the case of printing.	It is proposed that the Council issue three months notice to contractors with immediate effect and maintain a weekly publication until the notice period has elapsed.
It will be necessary to review and restructure staffing levels to reflect the new communications approach. This may necessitate redundancies if voluntary or redeployment solutions cannot be found.	It is proposed that a new structure be developed with effect from April 2016. Any restructure will follow the council's policy and include consultation with staff. As required every effort will be made to ensure voluntary or redeployment opportunities if reductions are required.
Financial projections depend on continued generation of a proportion of advertising income, assumptions about which need to be fully tested.	Work will be done with advertisers to maintain and maximise revenue. Staffing levels will also be reviewed to minimise costs.
Fortnightly publication does not align with paragraph 28 of the Code of Recommended Practice which states no more than quarterly.	Fortnightly publication as an interim measure enables East End Life to offer value for money and fulfil the role of ensuring the Council meets its statutory duties and promotes equality and cohesion in the unique circumstances of the borough. A wider review is underway to ensure the Council is fully code compliant from March 2016.
Excluded groups who rely on East End Life may have reduced access to information	A full equality impact assessment has been undertaken and the council will consult with readers of East End Life about future options

9 CRIME AND DISORDER REDUCTION IMPLICATIONS

9.1 None

10. SAFEGUARDING IMPLICATIONS

10.1 None

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Equality Impact Assessment

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

Officer contact details for documents:

Louise Russell, Service Head, Corporate Strategy and Equality
Extension 3267

Equality Analysis (EA)

Financial Year
2013/14

Section 1 – General Information (Aims and Objectives)

Reducing frequency of East End Life to fortnightly

See
Appendix A

Current decision
rating



Conclusion - To be completed at the end of the Equality Analysis process

On the basis of this equality analysis some adverse or potentially adverse impacts have been identified but these can be mitigated by the actions proposed and as this is an interim proposal can be more fully addressed in any recommendations arising from the wider review of communications.

Name: Louise Russell, Service Head, Corporate Strategy and Equality

Date signed off: 17/09/2015

Service area:
Communications

Team name:
East End Life

Service manager:
Kelly Powell

Name and role of the officer completing the EA:
Kelly Powell, Acting Deputy Head, Communications

Section 2 – Evidence (Consideration of Data and Information)

East End Life provides regular and reliable information about the council, its services and its work. It provides advice on welfare reform, promotes equality and cohesion, key health messages and it promotes the work of council partners, including housing associations. EEL provides these messages in two community languages to overcome literacy and language barriers.

The specific characteristics of the population of Tower Hamlets present a particular challenge in terms of effective, ongoing and meaningful communications. The borough's population is the fastest growing in England and Wales (ONS Census 2011). It is highly mobile (with a population churn of 12 per cent each year), young (24 per cent of the population is under 20) and diverse

(32 per cent of residents are of Bangladeshi origin, 31 per cent are White British, 23 per cent are other non-white minority ethnic and 14 per cent non-British white minority ethnic).

Over a hundred languages are spoken by children attending the borough's schools. It is also one of the poorest boroughs in the country with over half of the borough's children living in poverty. Within this context, East End Life has played a key role in promoting the council's Community Plan objectives and meeting our statutory duty to promote equality.

Section 3 – Assessing the Impacts on the 9 Groups

A reduction in publishing frequency for East End Life does represent an alteration or change to access of council services. It is likely to impact particularly on the council's potential to engage with particular groups of residents, including elderly residents; physically disabled residents; those with English as a second language and poor English literacy skills and residents whose socio-economic circumstances prevent them from accessing council messages through digital or paid for channels.

The Annual Residents' Survey 2015 found that EEL was a key source of information about the council for residents. 51 per cent of residents surveyed stated they read it regularly (readership levels have remained stable for 3 years). Readership information from a 2014 survey found that among particular key groups is even higher. Among over 65s it is 77 per cent among Bangladeshi residents it is 75 per cent, those living in social rented housing 74 per cent and it is 71 per cent in each of social class C2, those working part-time and the retired.

For many residents, particularly those in key socio-demographic groups, East End Life enables those residents to feel informed about the council and what it is doing. Whilst among all adults 55 per cent 'feel very / fairly well informed' this increases significantly among the following key groups. Among residents aged 65 plus it is 71 per cent, among Bangladeshi residents it is 70 per cent, among the social groups C2 and D&E it is 68 per cent and 61 per cent respectively. Among those with children 69 per cent, among the retired 67 per cent, and those in social housing 64 per cent or with no internet access also 64 per cent.

Digital engagement is growing in the borough is growing - 86 per cent of adults have access to the internet, however, these levels of access are strongly related to age. Only 38 per cent of those aged over 60 and 74 per cent of those aged 50 – 59 have internet access. Many of the groups most likely to read East End Life (older residents, those living in social housing and Bangladeshi residents) are the same groups who are least likely to favour online methods of contact with the council (Annual Residents Survey 2015).

In mitigation, the council is at this time only proposing a partial reduction in access to this service in moving from weekly to fortnightly. Residents will still have regular access to information about the council's priorities and services, albeit less frequently than currently.

The council is undertaking a wider review of communications which will consider future options for communicating with residents. This will include seeking the views of readers of East End Life and the particular needs of equality groups.

Target Groups	Impact – Positive or Adverse What impact will the proposal have on specific groups of service users or staff?	Reason(s)
Race	Adverse	Tower Hamlets is a diverse borough (32 per cent of residents are of Bangladeshi origin, 31 per cent are White British, 23 per cent are other non-white minority ethnic and 14 per cent non-British white minority ethnic). EEL provides a holistic communications channel to bring together council messages in English and accessible community languages – promoting cohesion and the council's key priorities. 51 per cent of residents surveyed stated they read it regularly (readership levels have remained stable for 3 years) Readership information from a 2014 survey found that among particular key groups is even higher. Among Bangladeshi residents it is 75 per cent. This provision will still be there but access will be reduced to some extent by moving fortnightly.
Disability	Adverse	A reduction in frequency of publication could impact adversely on residents who are housebound and/ or dependent on a publication that is delivered, in print, to their home. Once again, this is mitigated by continued publication and home delivery, albeit less frequently. In addition, the council is developing digital communications alternatives and will ensure that these are accessible to disabled residents.
Gender	No specific impact	
Gender Reassignment	No specific impact	
Sexual Orientation	Possible adverse	EEL has been a key communications channel in promoting equality, disseminating positive messages about sexuality and addressing social cohesion issues arising from extremist groups that have sought to bring division to the borough, including those promoting hate and homophobia. A reduction in these messages could have an impact on cohesion – however a fortnightly publication will still enable these messages to be promoted so the impact may not be significant.

Religion or Belief	Possible adverse	EEL has been a key communications channel in promoting understanding of different faiths and beliefs and addressing social cohesion issues arising from extremist groups that have sought to incite division between faith groups. A reduction in these messages could have an impact on cohesion – however a fortnightly publication will still enable these messages to be promoted so the impact may not be significant.
Age	Adverse	Statistics show that the borough's older residents are more dependent on non-digital channels to receive information about the council, council services and community support. EEL is currently the council's main non digital channel of communication; a reduction in circulation could impact adversely on older residents. Once again, this is mitigated by continued publication and home delivery, albeit less frequently. In addition, the council is developing digital communications alternatives and will ensure that these are accessible to disabled residents
Marriage and Civil Partnerships.	No specific impact	
Pregnancy and Maternity	No specific impact	
Other Socio-economic Carers	Possible adverse	Tower Hamlets is one of the most deprived borough's in London, and EEL is provides communities with a free resource from which to receive key communications from the council and community partners. Some households may not be able to afford paid for channels or devices to access and receive digital messages. However, this proposal still provides fortnightly access to free information and therefore the impact will be minimised.

Section 4 – Mitigating Impacts and Alternative Options

Alternative options have been considered and the reasons for not pursuing these are set out in the body of the decision report.

At this time the proposal is to reduce publication from weekly to fortnightly and therefore all those groups with protected characteristics who are potentially adversely affected will still have access to free home-delivered information, albeit less frequently.

The council is undertaking a wider review of the way in which it communicates with residents which will particularly consider the needs of residents with protected characteristics in taking final decisions about its future communications approaches. The review will be informed by the views of readers of East End Life and other local residents.

The council also has a digital inclusion strategy which is seeking to promote and increase digital access among currently excluded groups, including those with protected characteristic.

Page 10 of 10
Section 5 – Quality Assurance and Monitoring

Feedback will be sought from residents and readers of East End Life following any change in frequency of publication and this feedback will be used to capture particularly the views of those in the equality groups likely to be affected.

Does the policy comply with equalities legislation?
Yes

Section 6 - Action Plan

As a result of these conclusions and recommendations the following actions will be implemented in mitigation

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress




Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Communication of proposed changes ahead of implementation	Neutral, factual piece in EEL, local and BME media explaining the changes, including a clear signpost to the council's website as a portal for council information and an overview of social media channels that can be followed; promote the press release through all social media channels, on the council's website and to key partners working with residents (as above); also promote to the VCS (and third sector organisations), key housing, partners; key community safety and health partners.	End September	Kelly Powell	In development
Views of residents, including targeted groups, sought as part of the wider communications review	Online consultation developed to allow residents to feedback on the proposal Promote consultation in EEL, local and BME media; Idea Stores, through key partners (as above).	September/October	Kelly Powell	In development
Key partners (eg the Interfaith Forum; Community Safety Partners; youth services) involved in managing tensions in the borough will be advised of the changes and plans to	As above, ensure that key partners have details of the channels through feed into consultation and development of new arrangements	September/October	Kelly Powell	In development

minimise the impact on cohesion developed					
Key partners involved in supporting older residents (eg GPs, third sector organisations, adult social services) will be advised of the changes in order to minimise the impact on their client groups	As above, ensure that key partners have details of the channels through feed into consultation and development of new arrangements	September/October	Kelly Powell	In development	
Key partners involved in supporting ethnic and faith based groups (including faith institutions, Inter-faith Forum, New Residents and Refugees Forum) will be advised of the changes in order to minimise the impact on their client groups	28.9.15 – 8.11.15 (six weeks) Review consultation feedback fortnightly for updates to senior officers.	September/October	Kelly Powell	In development	
Implementation of the Digital Comms strategy	Deliver engaging and intuitive web experience for residents; deliver range of communication channels to communicate appropriately with the council's key audience (residents, service users, stakeholders, businesses and visitors to the borough); deliver change management programme to ensure that the council's audience have access to the new communications channels and skills to use them (tied to the council's digital inclusion strategy).	Action plan in place – work has been done to scope the channels that will deliver a suite of effective online audience engagement tools – to be delivered by 31.3.16; audience mapping shows that 80%+ of the council's audience can already access online channels; ongoing work with residents to promote online channels has been delivered through 'Get Online' week and promotional events across the borough since 2013.	Oda Riska	In development – strategy agreed June 2015 and in implementation	
Implementation of the Digital	Work with key partners to map	Action Plan in place and ongoing	Cross	Digital Inclusion	

Inclusion strategy	provision and access to digital resources and skills in the borough; identify capacity of council audience to access and use online resources and council services; implement channel shift to online and contact centre channels.	work is being done to move council engagement channels online; ongoing work is being done to improve the borough's access to free WiFi, free devices and opportunities to develop digital skills.	Council	Strategy in place; work delivering milestones is underway.
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Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 