

Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

Financial Inclusion Strategy

The purpose of the strategy is to provide a shared framework for financial inclusion in Tower Hamlets. The strategy aims to achieve a financially inclusive Tower Hamlets where residents have access to a comprehensive range of appropriate financial and money advice services, as well as the knowledge, skills and confidence to maximise their own financial well-being.

The strategy sits within the Prosperous theme of the Community Plan but it has a much broader cross-cutting impact. It is therefore closely related to other partnership strategies and projects including the Employment and Enterprise Strategy; Homelessness Strategy and Health and Wellbeing Strategy.

This is a draft strategy which will be informed by forthcoming public consultation including with local equality groups.

Who is expected to benefit from the proposal?

- § *Local people, particularly from vulnerable groups that are more likely to be financially excluded.* This includes younger adults, older people, disabled people, BME residents, homeless households, lone parent families and social housing tenants. The strategy aims to improve financial literacy and capability, support access to appropriate financial products and services and improve access to debt and money advice services.
- § *Statutory and third sector organisations.* A more joined-up and strategic approach to financial inclusion will benefit those organisations working in the sector including statutory and third sector groups.
- § In addition, the costs of financial exclusion are significant, such as debt recovery and dealing with stress-related illnesses. Studies have shown that effective financial inclusion provision can save money in the long-term.

Service area:

Corporate Strategy & Equality

Team name:

Strategy, Policy & Performance

Service manager:

Kevin Kewin

Name and role of the officer completing the EA:

Shibbir Ahmed

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The strategy has been informed by a detailed evidence base report which contains information on the prevalence and impact of financial inclusion and exclusion from a wide range of national, regional and local sources. These include:

- A survey of local front-line practitioners in the borough on the financial capability of their service users
- An analysis of poverty in the borough informed by a number of sources including the Indices of Multiple Deprivation
- Local data on the profile of users accessing debt advice
- Equality analysis of tenants in arrears by Tower Hamlets Homes
- Experian data on financial capability and vulnerability in Tower Hamlets
- Financial Inclusion Services studies on financial capability and financial exclusion and its impact on different groups
- Reports on financial inclusion and health and social care, including the Tower Hamlets Adult Social Care Survey 2010/11; Mind Report on financial inclusion and mental health, and the Tower Hamlets Joint Strategic Needs Assessment
- Runnymede Trust reports on ethnicity and financial inclusion
- Financial Inclusion Taskforce research on lower income and BME households and savings

Section 3 – Assessing the Impacts on the 9 Groups

How will what you're proposing impact upon the nine Protected Characteristics?

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

-Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

-List all examples of quantitative and qualitative data available
(include information where appropriate from other directorates, Census 2001 etc)

-Data trends – how does current practice ensure equality

- **Equalities profile of staff?**

-Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

-What are the potential or known barriers to participation for the different equality target groups? Eg, communication, access, locality etc

- **Recent consultation exercises carried out?**

-Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

-Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

-In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

Please Note -

Reports/stats/data can be added as Appendix

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Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	<p>Please add a narrative to justify your claims around impacts and,</p> <ul style="list-style-type: none"> Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making <p>Please also how the proposal with promote the three One Tower Hamlets objectives?</p> <ul style="list-style-type: none"> -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership <p>The evidence base report highlighted that the majority of the clients accessing financial inclusion services are from BME backgrounds, though BME groups only account for around 50 per cent of the population. National studies show that there is a significant difference between White and BME groups in relation to financial capability, as well as access to financial products and institutions. Low levels of financial capability among BME groups has been linked with comparatively lower educational attainment, higher levels of unemployment and lower income levels. Language and literacy issues also pose potential barriers for some people from BME communities in accessing financial products and services.</p> <p>In order to address these issues the FIS strategy will:</p> <ul style="list-style-type: none"> § Incorporate financial inclusion training into Parenting Support, ESOL and other adult literacy and lifelong courses / provisions that will support BME communities in improving financial literacy and capability. § Promote services that work with BME communities to further increase take up of provision. § Promote services to diverse communities via partner organisations as well as through the use of community champions. § Promote basic information on banking, savings and credit products to raise BME residents’ levels of awareness, skills and confidence so that they can choose and use appropriate financial products to meet their needs.
Disability and carers	Positive	<p>National studies show that disabled people, those with poor health, and carers, are among the groups most likely to experience financial exclusion and struggle to deal with their finances. In 2010 the Marmot Review on health inequalities recognised financial security as a social determinant of health – highlighting that poor financial management has an impact on health and wellbeing. Locally, dealing with finances and paper-work was identified as the highest area of need for adult social care users, with 58% of respondents to the 2010/11 Adult Social Care Service User Experience Survey stating that they are unable to deal with these themselves.</p> <p>There are many reasons why disabled people find it difficult to deal with money. For some this may be caused by a visual impairment, whilst for others it may be that their disability makes it hard for them to read and understand words and numbers. For some disabled people, it may be that they have simply not had the experience or opportunity to manage money before. Some work has been done locally with health and social care professionals on financial inclusion, including through the Health Trainers project.</p>

		<p>The expansion of direct payments and personalised budgets makes it even more important that the financial capability needs of adult social care users are fully addressed to ensure that service users can live as independently as possible.</p> <p>Through the strategy we will look to integrate financial capability provision as part of health and social care services and the promoting independence agenda. This includes improving the screening of financial capability and money management issues of vulnerable residents and / or service users as part of their assessments.</p>
Gender	Positive	<p>National studies have highlighted that single parents and victims of domestic violence, who are most likely to be women, are among the groups of people who are particularly vulnerable to financial exclusion.</p> <p>The strategy will help ensure that financial provision is available to people irrespective of their gender. In addition to this, targeted work will also take place to support specific groups vulnerable to financial exclusion. For example the needs of Domestic Violence victims will be picked up through improving the screening of financial capability and money management issues of vulnerable residents as part of their assessment and training of frontline practitioners.</p>
Gender Reassignment	Positive	<p>The FIS aims to ensure that financial provision is available to people irrespective of their gender reassignment. However, there is no available evidence to assess the impact of the financial exclusion on groups based on gender reassignment.</p> <p>Any information related to this protected characteristic that comes back from the consultation exercise will be fed into the EIA and Strategy.</p>
Sexual Orientation	Positive	<p>The FIS aims to ensure that financial provision is available to people irrespective of their sexual orientation. However, there is no available evidence to assess the prevalence or impact of financial exclusion based on sexual orientation.</p> <p>Any information related to this protected characteristic that comes back from the consultation exercise will be fed into the EIA and Strategy.</p>

Religion or Belief	Positive	<p>The evidence base report found that some BME communities are less likely to engage with formal financial services – particularly savings and credit products, often because they lack trust in banks, are reluctant to get into debt or deal with interest due to religious and ethical concerns.</p> <p>In addition to providing inclusive services for people of all religions and beliefs, the strategy will work in partnership with the financial services industry and faith communities to increase access to suitable financial products and services.</p>
Age	Positive	<p>Tower Hamlets has the highest level of child poverty in the country and research shows that young people, particularly those on low incomes; those living independently or in supported housing; those with children; and those with poor levels of education, literacy and numeracy, typically have lower levels of financial capability. Tower Hamlets has a young population with 14% of people aged 16 to 24.</p> <p>Through the strategy, local partners will continue to build on and expand early intervention and life-skill approaches, including working with education providers and other children and youth organisations in the borough to develop effective approaches to supporting young people at risk of financial exclusion.</p> <p>The borough also has a high level of pensioner poverty, which puts many older people at risk of financial exclusion. Some initial work with Age Concern and Linkage Plus has taken place, including outreach provision and one-to-one support with money advice services. This will be expanded upon to help ensure that there is sufficient targeted provision to meet the needs of older people.</p>
Marriage and Civil Partnerships	Positive	<p>The strategy aims to provide inclusive and accessible services for all residents, including married people and those in civil partnerships, and those that are not. However, there is no available evidence to assess the prevalence and impact of financial exclusion based on marriage or civil partnership status.</p> <p>Any information related to this protected characteristic that comes back from the consultation exercise will be fed into the EIA and Strategy.</p>
Pregnancy and Maternity	Positive	<p>Studies show that people are more likely to experience financial vulnerability at key transition stages in their lives, including when starting a family. There also appears to be a correlation between the number of children in a household and the level of financial capability. Those with no children have the lowest levels of poor financial capability, whilst those with four or more children have the highest levels of financial vulnerability.</p> <p>The Strategy will enable local partners to target provision at new and teenage parents, including</p> <ul style="list-style-type: none"> § working with health trainers and the Family Nurse Partnership to provide information and advice on money management issues, financial inclusion, benefits and tax credits for new parents § integrating money management support and financial capability into frontline services such as maternity,

		<p>parenting and family support services.</p> <ul style="list-style-type: none">working with frontline staff to improve the screening of financial capability and money management issues of vulnerable residents as part of their assessment processes, and ensure that money management is part of overall support packages.
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Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No? No

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

N/A

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? Yes No?

How will the monitoring systems further assess the impact on the equality target groups?

The delivery of the strategy will be the responsibility of organisations within the Tower Hamlets Partnership. A detailed action plan will be developed which outlines the lead organisation for each action. The steering group of the Financial Inclusive Tower Hamlets Network will monitor progress against the action plan and the impact on equality target groups.

Does the policy/function comply with equalities legislation?

(Please consider the OTH objectives and Public Sector Equality Duty criteria)

Yes? Yes No?

If there are gaps in information or areas for further improvement, please list them below:

As highlighted above, the consultation exercise will seek to fill gaps in information and identify areas for improvement, including by protected characteristic.

How will the results of this Equality Analysis feed into the performance planning process?

The results of this Equality Analysis are informing the consultation draft and consultation process which will feed into the final Strategy.

Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Example				
1. Better collection of feedback, consultation and data sources	1. Create and use feedback forms. Consult other providers and experts	1. Forms ready for January 2010 Start consultations Jan 2010	1.NR & PB	
2. Non-discriminatory behaviour	2. Regular awareness at staff meetings. Train staff in specialist courses	2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	2. NR	

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Revise the draft Strategy based on the equalities feedback from the consultation	Draft Strategy to go out for public consultation, including a specific focus on gaining feedback from equalities stakeholder forums.	Nov 2012	Shibbir Ahmed	TBC

Section 7 – Sign Off and Publication

Name: (signed off by)	
Position:	
Date signed off: (approved)	

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Section 8 Appendix – FOR OFFICE USE ONLY

This section to be completed by the One Tower Hamlets team

Policy Hyperlink :

Equality Strand	Evidence
Race	
Disability	
Gender	
Gender Reassignment	
Sexual Orientation	
Religion or Belief	
Age	
Marriage and Civil Partnerships.	
Pregnancy and Maternity	
Other Socio-economic Carers	

Link to original EQIA	Link to original EQIA
EQIAID (Team/Service/Year)	