

Equality Analysis (EA)

Financial Year
2018/19

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose

Community Governance Review 2018-19

The proposal under consideration by the Council is whether to create a parish council in the Spitalfields area. The process of conducting a community governance review is governed by statute.

See
Appendix A

Current decision
rating
Red



This Equality Analysis has been prepared to consider equality impacts relating to the community governance review triggered by a petition from local residents to set up a parish ('town') council within the Tower Hamlets council wards of Spitalfields & Banglatown and Weavers. A parish council is a democratically elected, additional and legally independent tier of local government with its own councillors, which can provide a range of local services within a defined area. A parish council operates at a local level below the principal council, in this case Tower Hamlets Council.

Background

The legislative framework for community governance reviews is set out in the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'). Chapter 3 of Part 4 of the 2007 Act devolves the power to take decisions about matters such as the creation of parishes and their electoral arrangements to local government and local communities in England.

Under the terms of the 2007 Act, the Council must have regard to guidance issued by the Secretary of State about undertaking community governance reviews.¹ The most recent guidance was issued in March 2010.²

In making its final decision the Council has a duty to secure that community governance within the area under review:

- a) reflects the identities and interests of the community in that area, and
- b) is effective and convenient³

Relevant considerations which should influence the Council's judgement against these two principal criteria include the impact on community cohesion and the size, population and boundaries of the proposed area.⁴

The government has further clarified criterion b) by stating that the effectiveness and convenience of local government is best understood in the context of a local authority's ability to deliver quality services economically and efficiently, and to give users of services a democratic voice in the decisions that affect them.⁵

The Council is required to consult with local government electors for the area under review and any other person or body which appears to have an interest in

¹ Local Government & Public Involvement in Health Act 2007 100(4)

² Guidance on Community Governance Reviews. Department for Communities and Local Government and Local Government Boundary Commission for England. 2010

³ Local Government & Public Involvement in Health Act 2007. 93(4)

⁴ Guidance on community governance reviews DCLG & LGBCE 2010 para 53

⁵ Guidance on community governance reviews DCLG & LGBCE 2010 para 62

the review.⁶ It must take into account any representations received in connection with the review.⁷

In making its final recommendations, the Council should consider the information it has received in the form of expressions of local opinion, representations made by local people and other interested persons, and also use its own knowledge of the local area. In taking this evidence into account and judging the criteria in the 2007 Act against it, a principal council may reasonably conclude that a recommendation set out in a petition should not be made.⁸

Where a principal council has conducted a review following receipt of a petition, it will remain open to the Council to make a recommendation which is different to the recommendation the petitioners wished the review to make. This will particularly be the case where the recommendation is not in the interests of the wider local community, such as where giving effect to it would be likely to damage community relations by dividing communities along ethnic, religious or cultural lines.⁹

The council is required to consult local government electors in the area under review, and others who appear to have an interest in the review. When undertaking a review they must have regard to the need to ensure that the community governance reflects the identities and interests of the community in the area under review, and the need to ensure that community governance in that area is effective and convenient.

In the development of its proposals the council has a legal duty to engage people with the protected characteristics under the Equality Act 2010.

Specifically it needs to have due regard to the need to:

1. eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Act;
2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Phase 1 of the public consultation of the community governance review opened on 8 October 2018 and ran for 12 weeks until 31 December 2018. The council chose an initial consultation period of 12 weeks to enable a broad range of views to be gathered and to gauge levels of support for proposals in the petition.

The consultation programme covered online, social media, print and face-to-face channels in order to encourage a broad range of responses that represented the diverse population of the borough.

The second stage, phase 2 consultation, putting forward the council's draft recommendations after considering findings from phase 1, started on 6th March 2019 and ran for 12 weeks until 28 May 2019. This second phase consultation was designed to gather views and gauge the level of support for the council's draft recommendations. In its phase two consultation document the council put forward three broad options for consideration:

1. Create a new parish council to be called Spitalfields & Banglatown

⁶ Local Government & Public Involvement in Health Act 2007 93(3)

⁷ *ibid.* 93(6)

⁸ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 para 96

⁹ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 para 95

Parish Council.

2. Reject the proposal to create a parish council and set up other (non-parish) ways for local people to be represented and get involved. This was the council's preferred option at this stage of the review.
3. Reject the proposal to create a parish council. with no change to current governance arrangements.

The council also asked for the views on the three possible parish boundary options, if a new parish council were to be created.

A broad range of communication methods were used to inform people about the consultation. The consultation was published on the Council's website and through its social media channels. A press release was issued with the launch of the phase two consultations. As well as distributing hard copy consultation documents to residents, the council wrote to local faith organisations and places of worship, voluntary and community groups in the area including those working with groups with specific protected characteristics, public sector bodies and local businesses. Posters were put up in a range of public venues. The consultation was also promoted by word of mouth through face-to-face engagement and outreach.

The consultation was promoted through the Council's Twitter account (@TowerHamletsNow) and Facebook page. The Council posted 18 tweets about the consultation and received 26,094 impressions. The Council published 15 posts on its Facebook page, which received 14,320 impressions..

To provide information about the consultation, the Council produced 550 A4 booklets and 1000 A5 fliers advertising consultation roadshows and information about how people could respond. These were distributed to households and street outreach throughout the consultation period.

Printed copies of the consultation document were distributed by London Letterbox (a private company) to 13,000 households in the two community governance review wards.

A further 850 copies were distributed by the Council in community venues, at roadshows and through outreach. The consultation document was also made available on the council's website for review or download. An email and postal address was provided for residents to request a copy of the consultation document in a format of their choosing or to ask for supporting in completing the consultation questionnaire. Paper copies of the consultation questionnaire were also available on request and were distributed through outreach and at the consultation roadshows.

Nine hundred letters were sent to people that had responded to phase one of the consultation informing them of the outcome, next steps and thanking them for their contributions.

Emails were sent to a variety of relevant organisations including:

- Local businesses
- Local voluntary sector organisations and community groups
- Local public sector organisations
- Neighbouring local authorities (City of London Corporation, Hackney Council, Newham Council) and the GLA.
- Faith organisations

Five drop-in roadshows were held at different venues across the area to provide additional information to residents and answer any questions that could promote

involvement. Four out of five of the drop in sessions were within the boundary options put forward by the Council. All five were within ten minutes walking distance of the centre of the area covered by Boundary Option III (the largest area). They were also intended to publicise the review, provide information about the consultation and, if requested, provide support for individuals to complete a questionnaire. They were held at different venues and times suitable for different sections of the community in the area. Particular target groups were people from ethnic minorities with a focus on the Bangladeshi community and women. Findings from phase one consultation had shown that these groups were under-represented in consultation responses.

Detailed reports from both phases of consultation are available on the Council website at www.towerhamlets.gov.uk/consultations.

The consultation findings should inform the council's final decision. In making that decision, however, the council needs to be mindful of its primary duty to secure that community governance within the area under review:

- a) reflects the identities and interests of the community in that area, and
- b) is effective and convenient.

Relevant considerations which should influence the council's judgement against these two principal criteria include the impact on community cohesion, and the size, population and boundaries of the proposed area.

The government has further clarified criterion b) by stating that the effectiveness and convenience of local government is best understood in the context of a local authority's ability to deliver quality services economically and efficiently, and give users of services a democratic voice in the decisions that affect them.

Review objectives

The objectives of the review set out in the terms of reference are as follows:

1. To fulfil the council's obligations to undertake a community governance review following the receipt of a valid petition. The current guidelines state that we must complete this review within 12 months of the receipt of the petition.
2. To consider whether the creation of a parish council reflects the identities and interests of the community in the area.
3. To ensure that any proposed arrangements provide effective and convenient local government, including viability in the provision of services, the promotion of well-being and community cohesion.
4. To take into account any other arrangements for community representation and engagement in the area that are already in place or that could be made.
5. To consider options for electoral arrangements for the parish council should the proposal to create a parish council be adopted.

Government guidance recognises that while 'place' is important in shaping a sense of community identity it is not the only factor that needs to be taken into account.¹⁰ In a borough like Tower Hamlets, there are diverse communities of interest as well as those centred on neighbourhood or locality; for example, representing age, gender, ethnicity, faith or lifestyle

¹⁰ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.60

groups. Any number of communities of interest may flourish in an area but they do not necessarily centre on a specific place or help to define it. The Council is mindful that the identity, needs and interests of all these various communities require balancing in making a decision on whether to create a parish.

Where a principal council has conducted a review following receipt of a petition, it will remain open to the Council to make a recommendation which is different to the recommendation the petitioners wished the review to make. This will particularly be the case where the recommendation is not in the interests of the wider local community, such as where giving effect to it would be likely to damage community relations by dividing communities along ethnic, religious or cultural lines.¹¹

Government guidance points out the potential role for parish councils in strengthening community engagement and participation and in generating a positive impact on community cohesion.¹² It states that principal councils should consider the impact on community cohesion of community governance arrangements.¹³ Cohesion issues are connected to the way people perceive how their local community is composed and what it represents, and the creation of parishes and parish councils may contribute to improving community cohesion. However, the guidance also specifically asks principal councils to consider whether a recommendation made by petitioners will undermine community cohesion in any part of its area.¹⁴

Community governance arrangements should reflect, and be sufficiently representative of, people living across the whole community and not just a discrete cross-section or small part of it. A principal council is advised not to make a decision to create a parish which may threaten community cohesion. Principal councils may decline to set up such community governance arrangements where they judge that to do so would not be in the interests of either the local community or surrounding communities, and where the effect would be likely to damage community cohesion.¹⁵ Government guidance on this matter recognises that challenges to community cohesion are very local and that local authorities because of their knowledge of local communities are in a good position to assess these challenges.¹⁶

The Council should have regard to the Public Sector Equality Duty as set out in the Equality Act 2010. In particular the Council should have due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Government guidance gives a working definition of this as ‘the growth of relations and structures that acknowledge the diversity of society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms’.¹⁷ Of particular relevance is the need to consider whether a parish council would be likely to increase diversity in civic and political participation and increase reported confidence and trust in institutions subject to the duty. In reaching its decision, the Council is also required to have regard to the need to advance equality of opportunity. Of particular relevance is the requirement to encourage participation in public life, including democratic engagement.

¹¹ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 para 95

¹² Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.67

¹³ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.67

¹⁴ Guidance on Community Governance Reviews. DCLG & LGBCE 2010. s.75

¹⁵ Guidance on Community Governance Reviews. DCLG & LGBCE 2010. s.74

¹⁶ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.76

¹⁷ Equality Act 2010: Technical Guidance on the Public Sector Equality Duty: England. Equality & Human Rights Commission 2014. 3.35

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

A consideration of both quantitative and qualitative data gathered to inform the community governance review indicates that there is a significant risk that establishing a parish and parish council in the Spitalfields area could undermine community cohesion both within the area and between the area and other parts of the borough.

During both phases of consultation, concerns were expressed by some that the creation of a parish could divide local communities and have a negative impact on community cohesion. More than one in four of those opposing the creation of a parish gave this as a principal reason for their opposition to the proposal. Most set out their concerns in terms of the original boundary proposal dividing better off areas from more deprived ones. The Council notes that whilst the original area proposed does contain comparatively less deprived areas than those around it it also does contain more deprived neighbourhoods. There is clearly a risk, however, that a perception of division on the basis of socio-economic status would persist in surrounding areas and other parts of the borough, were a parish to be created. The borough profile 2018 shows a strong correlation between socio-economic status and ethnicity in the area, with people from Asian/Asian British: Bangladeshi ethnic origin more likely to live in areas of higher deprivation.

Some consultees argued that the creation of a parish council did not have the support of a broad cross section of the community in the area. This is confirmed by the Council's analysis of consultation responses. In phase two, for example, 80% of those who gave their ethnicity as Asian / Asian British did not support the creation of a parish council. Opposition to the creation of a parish council was also high amongst those who gave their religion as Muslim, with 91.2% of this group opposing the proposal.

A parish council in the area, if created at any point in the future, would be a separate legal entity from the London Borough of Tower Hamlets. It would however be subject to the Public Sector Equality Duty and as such should have regard to relationships between groups with protected characteristics and put in place measures to address and mitigate them. It is the view of the Council that further work is needed to understand and address issues of integration and community cohesion within the area before a decision could be taken to create a parish council. The Council would need to take this into account in any future Community Governance Review in deciding whether or not to create a parish council.

Name:

(signed off by)

Date signed off:

(approved)

Service area: Governance

Team name:

Democratic Services

Service manager:

Matthew Mannion

Name and role of the officer completing the EA:

Janette John

Strategy and Policy Officer

Steve Morton
Senior strategy, policy and performance manager

Vicky Allen
Intelligence and performance manager

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?

Information available and which has been considered is:

- Census 2011 data
- Borough Profile 2018 data
- Borough equality assessment 2016/17
- London Borough of Tower Hamlets Council Tax data
- Community governance review – phase one consultation report
- Community governance review – phase two consultation report
- Producing modelled estimates of the size of the lesbian, gay and bisexual (LGB) population of England report published by Public Health England
- LGA Research: Cohesion and Integration in Tower Hamlets 2019
- Home Office Indicators of Integration Framework 2019

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes and evidence how your proposal impacts upon the nine Protected Characteristics in the section below.

Target Groups	Impact – Positive or Adverse	Reason(s)
Ethnicity	Potential for adverse impact on community cohesion related to ethnicity	<p data-bbox="680 212 2101 325"> <ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making </p> <p data-bbox="680 339 1883 371">Please also how the proposal will promote the three One Tower Hamlets objectives?</p> <ul data-bbox="680 384 1211 507" style="list-style-type: none"> -Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership <p data-bbox="633 624 2107 874">Tower Hamlets is ranked as the 16th most ethnically diverse local authority in England in terms of the mix of different ethnic group populations. The Spitafields & Banglatown and Weavers wards are reflective of this diversity. The Census 2011 identified that 17.5% of residents in the Spitafields & Banglatown Ward identify as White British, 11.1% as Other White, 2.2% Mixed, 28.6% Asian/Asian British: Bangladeshi, 3.3% Black and 37.4% as other. The ethnic makeup of Weavers Ward residents is similar with 23.7% White British, 9.1% other White, 2.2% Mixed, 19.1% Asian/Asian British: Bangladeshi, 4.6% Black and 40.4% as other.</p> <p data-bbox="633 922 2107 1098">Census 2011 data identified that residents in the parish area proposed by petitioners has 30.1% of residents who identify as White British, 20.2% as Other White, 3.4% as Mixed, 26.5% as Asian/Asian British: Bangladeshi, 3.8% as Black and 16% as 'other'. This differs slightly to the overall population of Tower Hamlets identified in the Borough Profile 2017/18 where Bangladeshi residents were found to make up 32% of the total population.</p> <p data-bbox="633 1145 2107 1423">The Borough Atlas, contained within the Borough Profile 2018 breaks down by small area (LSOA), 22 indicators. Whilst there is not a complete overlap between the areas drawn up for the purposes of consultation on the creation of a parish and the small areas in the Borough Atlas some tentative conclusions can be drawn. Area A, which forms the core of the original proposal by petitioners to create a parish, is less deprived than surrounding areas as measured by the Index of Multiple Deprivation. It has fewer households with dependent children, fewer children living in families receiving tax credits, few children living in income deprivation, fewer residents from BME groups (although a higher proportion of residents born outside the UK), fewer older residents living in poverty, a higher proportion of residents in</p>

employment, a higher proportion of residents in professional and managerial roles.

Prior to the phase 1 consultation we identified residents from groups that could be impacted by this proposal. In order to mitigate any negative impacts on those from an ethnic minority background several actions were undertaken to engage with various groups during both phases of consultation. These actions included the following:

- Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place;
- Letters were written to all residents listed on the Council Tax Register as living in the area;
- Letters/emails were sent to all faith community and voluntary organisations/community groups working with ethnic minority groups in the area.
- Fliers were produced in both English and Bangladeshi and were available at various locations in the area.
- Posters were produced and distributed to locations in and around the area.
- Local residents some of whom were from ethnic minority backgrounds were employed as community researchers to engage on a face to face basis encouraging people from ethnic minority backgrounds to participate in the consultation. To make this process effective the researchers were able to communicate with residents in a variety of languages, with a particular focus on Bengali.
- Outreach included distribution of material in local mosques and community venues
- Venues for consultation roadshows were selected on the basis of their use by different sections of the community. The Osmani Centre and Kobi Nasrul Centre were chosen because of their use by the Bangladeshi community in the area.
- Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information.
- A special email address was created so that residents could directly request further information about the consultation when required.

Whilst data from phase one consultation indicated that people of Asian / Asian British ethnicity were under-represented in responses data from phase two showed an over-representation. This could indicate the success of targeting in phase two. It could also, however, indicate the strength of feeling in this community in relation to the proposal.

During both phases of consultation, concerns were expressed by some that the creation of a parish

could divide local communities and have a negative impact on community cohesion. More than one in four of those opposing the creation of a parish gave this as a principal reason for their opposition to the proposal. Most set out their concerns in terms of the original boundary proposal dividing better off areas from more deprived ones. The Council notes that whilst the original area proposed does contain comparatively less deprived areas than those around it it also does contain more deprived neighbourhoods. There is clearly a risk, however, that a perception of division on the basis of socio-economic status would persist in surrounding areas and other parts of the borough, were a parish to be created. The borough profile 2018 shows a strong correlation between socio-economic status and ethnicity in the area, with people from Asian/Asian British: Bangladeshi ethnic origin more likely to live in areas of higher deprivation.

Some consultees argued that the creation of a parish council did not have the support of a broad cross section of the community in the area. This is confirmed by the Council's analysis of consultation responses. In phase two, for example, 80% of those who gave their ethnicity as Asian / Asian British did not support the creation of a parish council. Opposition to the creation of a parish council was also high amongst those who gave their religion as Muslim, with 91.2% of this group opposing the proposal. There is a strong correlation between Asian / Asian British: Bangladeshi ethnicity and Muslim faith so this finding is to be expected.

In assessing the likely impact that the creation of a parish council could have on community cohesion it is worth noting that social relationships can facilitate or hamper both individual and collective access to resources. Networks of relationships characterised by trust and reciprocity can be understood as generating 'social capital' because they enable people to use and exchange resources. However, social networks can also serve to entrench divisions and inequalities due in part to differences in access to power and/or resources.¹⁸ Creating a new institution where there is evidence of a lack of trust based on perceptions of divisions along lines of ethnicity, religion or socio-economic status may be unwise without fully understanding how these perceptions arise and how they are best addressed.

The tables below show the breakdown of phase two consultation responses by ethnicity and data from the 2011 census for the area covered by the boundaries proposed by the Council. Further detail on levels of support and opposition to the proposal can be found in the phase one and two consultation reports for the community governance review.

¹⁸ Home Office Indicators of Integration framework 2019

Responders by ethnicity	Grand Total		Responders from within Parish Boundary Options	
	Number	%	Number	%
Total	2173	100%	1239	100%
Prefer not to say	417	19.2%	298	24.1%
<i>Responses from</i>				
Asian / Asian British	1226	69.4%	647	68.5%
Black / Black British	21	1.2%	8	0.8%
Mixed / Dual Heritage	25	1.4%	12	1.3%
Other	23	1.3%	14	1.5%
White British / White Other	461	26.1%	260	27.5%
All responders answering the question	1756	100.0%	941	100.0%

Census Data by ethnicity	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
Total	254,096	100.0%	12770	100.0%
<i>Responses from</i>				
Asian / Asian British	104,501	41.1%	5,534	43.3%
Black / Black British	18,629	7.3%	551	4.3%
Mixed / Dual Heritage	10,360	4.1%	434	3.4%
Other	5,787	2.3%	278	2.2%
White British / White Other	114,819	45.2%	5,973	46.8%

<p>Disability</p>	<p>No adverse impacts identified related to disability</p>	<p>Census 2011 data identified that 4.1% of residents in the Spitafields/Banglatown Ward identify as long term sick or disabled, this is similar to the Weavers Ward where the number is 4.6% of residents. 3.2% of residents identify as long term sick or disabled in the proposed area which is slightly lower than the wards.</p> <p>Prior to the phase one consultation we identified residents from groups that could be impacted by this proposal. In order to ensure residents who are less able were aware of the consultation and to mitigate any negative impacts several actions were undertaken to engage with disability groups. These actions included the following:</p> <ul style="list-style-type: none"> • The council funds a disability advocacy group that has a wide reaching network and its own steering group that is made up of people with disabilities. A meeting was held with the steering group encouraging them to participate and share the information about the consultation. • Mixed methods for engagement included online, face to face, and in writing • Residents were able to request the consultation document and questionnaire in different formats • Residents were offered support in completing a questionnaire if they wished. • Consultation documents published online were in a format suitable for access by people with visual impairment. <p>The following additional actions were taken in phase two</p> <ul style="list-style-type: none"> • Increased outreach to a broader range of disability groups including REAL (local voices project), and AccessAble to help promote the consultation and encourage participation by their membership base. • Consultation materials were produced in formats accessible to a broader range of people with disabilities. <p>Consultation response rates in phases one and two were broadly reflective of the proportion of local residents identifying as long terms sick or disabled. The chart below shows phase two consultation responses compared to 2011 census data.</p>
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Responders by disability	Grand Total		Responders from within Parish Boundary Options	
	Number	%	Number	%
Total	2173	100%	1239	100%
Prefer not to answer	638	29.4%	429	34.6%
<i>Responses from</i>				
No	1448	94.3%	775	95.7%
Yes	87	5.7%	35	4.3%
All responders answering the question	1535	100.0%	810	100.0%

Census Data by disability	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
All categories: General health	254,096	100%	12770	100%
Very good health	128,468	50.6%	6703	52.5%
Good health	83,209	32.7%	4033	31.6%
Fair health	27,062	10.7%	1247	9.8%
Bad health	11,228	4.4%	557	4.4%
Very bad health	4,129	1.6%	230	1.8%

<p>Sex</p>	<p>Potential for adverse impacts identified in relation to sex</p>	<p>Census 2011 data identifies that there are similar numbers of male and female residents in both the Wards with 53.9% male and 46.1% female residents in the Spitalfields/Banglatown ward and 51.9% male and 48.1% female residents in the Weavers Ward. This is consistent with Tower Hamlets as a whole as identified in the Borough Profile 2017/18 where male residents were found to slightly outnumber female residents in Tower Hamlets by around 12,900.</p> <p>Census 2011 data identified that residents in the parish area proposed in the petition has 55% of residents who identify as male and 45% of residents who identify as female.</p> <p>Prior to the consultation we identified residents from groups that could be impacted by this proposal. Actions were undertaken to engage with these groups, which includes the following:</p> <ul style="list-style-type: none"> • Leaflets were handed out at Mariam Centre which is a womans only space within the London Muslim Centre in order to encourage more woman to take part in the consultation. • Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place; • Letters were written to all residents listed on the Council Tax Register as living in the area; • Letters/emails were sent to all faith community and voluntary organisations/community groups. • Fliers were produced in both English and Bangladeshi and were available at various locations in the area. • Fliers and posters were produced and distributed to locations in and around the area. • Local residents (both female and male) were employed as community researchers to engage on a face to face basis encouraging people to participate in the consultation. These researchers were tasked to specifically target women in order to increase participation. Outreach was conducted in venues likely to be used by women including local schools and health facilities. • Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information. • A special email address was created so that residents could directly request further information about the consultation when required. <p>Additional actions in phase two included:</p> <ul style="list-style-type: none"> • Roadshows held at two venues which target women – St Hilda’s Centre and the Osmani Centre <p>Analysis of both phases of consultation showed that women were under-represented amongst those responding, with men over-represented. There is some evidence cited in the Borough profile 2018 that</p>
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women from Black and Ethnic Minority communities are less likely to participate in civic and democratic life than men from those communities.

It is difficult to draw firm conclusion about the potential for a parish council to address differential levels of participation in civic and democratic life based sex and sex/ethnicity. At best there is likely to be a neutral impact. It is possible however that creation of a parish council could reinforce gender differences in participation.

Data showing phase two responders by sex and data from the 2011 census are shown in the chart below.

Responders by sex	Grand Total		Responders from within Parish Boundary Options	
	Number	%	Number	%
Total	2173	100%	1239	100%
Prefer not to say	349	16.1%	249	20.1%
<i>Responses from</i>				
Female	629	34.5%	398	40.2%
Male	1189	65.2%	588	59.4%
Prefer to self describe	6	0.3%	4	0.4%
All responders answering the question	1824	100.0%	990	100.0%

Census Data by Gender	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
Total	254,096	100.0%	12770	100.0%
<i>Responses from</i>				
Female	130,906	51.5%	5919	46.4%
Male	123,190	48.5%	6851	53.6%

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<p>Gender Reassignment</p>	<p>No adverse impacts have been identified related to gender reassignment</p>	<p>There is no readily available data to help inform us of this protected characteristic. We do however believe that the necessary steps were taken to ensure that information would be made available to people with this protected characteristic as part of the consultation process as outlined below.</p> <p>Prior to the consultation we identified residents from groups that could be impacted by this proposal. These actions included the following:</p> <ul style="list-style-type: none"> • Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place; • Letters were written to all residents listed on the Council Tax Register as living in the area; • Letters/emails were sent to all faith community and voluntary organisations/community groups (including LGBTQ organisations and those providing services to LGBTQ residents). • Fliers were produced in both English and Bangladeshi and were available at various locations in the area. • Fliers and posters were produced and distributed to locations in and around the area. • Local residents were employed as community researchers to engage on a face-to-face basis encouraging people to participate in the consultation. • Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information. • A special email address was created so that residents could directly request further information about the consultation when required. <p>There is very little information relating to gender reassignment from survey respondents however in phase two of the consultation, in addition to the above the following actions were undertaken to engage with residents who may be undergoing gender reassignment:</p> <ul style="list-style-type: none"> • There was further outreach to LGBTQ groups including ELOP to help promote the consultation and encourage participation by their user base.
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<p>Sexual Orientation</p>	<p>No adverse impacts have been identified related to sexual orientation</p>	<p><i>Producing modelled estimates of the size of the lesbian, gay and bisexual (LGB) population of England</i> report published by Public Health England in January 2017 identified that 8.7% of respondents of the GP Patient Survey 2015 residing in Tower Hamlets identified as lesbian, gay, bisexual or 'other', This was the third highest in Greater London. This information indicates that Tower Hamlets has the third highest population of LGBT residents in London although we do not have a further breakdown by ward.</p> <p>Prior to the consultation we identified residents from groups that could be impacted by this proposal. These actions included the following:</p> <ul style="list-style-type: none"> • Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place; • Letters were written to all residents listed on the Council Tax Register as living in the area; • Letters/emails were sent to all faith community and voluntary organisations/community groups (including LGBTQ organisations and those providing services to LGBTQ residents). • Fliers were produced in both English and Bangladeshi and were available at various locations in the area. • Fliers and posters were produced and distributed to locations in and around the area. • Local residents were employed as community researchers to engage on a face to face basis encouraging people to participate in the consultation. • Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information. • A special email address was created so that residents could directly request further information about the consultation when required. <p>There is very limited information relating to the sexual orientation of survey respondents however we ensured the phase two consultation was promoted as detailed below::</p> <ul style="list-style-type: none"> • Further outreach to LGBTQ groups including ELOP to help promote the consultation and encourage participation by their user base; and • We utilised the LBTH LGBT Staff Forum 'Tower PRIDE' to help cascade information to staff who are residents in the area. • Targeted information via social media and other channels was considered but not implemented. <p>Data showing phase two responders by sexual orientation and data from the 2011 census are shown in the table below.</p>
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Responders by sexual orientation	Grand Total		Responders from within Parish Boundary Options	
	Number	%	Number	%
Total	2173	100%	1239	100%
Prefer not to say	1360	62.6%	818	66.0%
<i>Responses from</i>				
Bisexual	28	3.4%	10	2.4%
Gay man	51	6.3%	24	5.7%
Gay woman/lesbian	6	0.7%	4	1.0%
Heterosexual/straight	705	86.7%	375	89.1%
Prefer to self describe	23	2.8%	8	1.9%
All responders answering the question	813	100.0%	421	100.0%

Religion or Belief	Potential adverse impacts have been identified related to religion or belief	<p>Tower Hamlets has the highest proportion of Muslim residents in the country with the Borough Profile identifying that 38% of residents identify as Muslim. This number for London is 13% and England 5%. Christianity is the second highest religion/belief in the Borough with 30% of residents identifying as Christian which is lower than both the rates in London and England which are 49% and 59% respectively. Tower Hamlets has a significantly higher proportion of residents who did not state their religion on the census form when compared to London and the rest of England</p> <p>Census information tells that in Spitalfields & Banglatown ward the proportion of residents who identified themselves as Christian was 18.4 per cent – lower than the borough average of 27.1 per cent. At 41.5 per cent of the population, the proportion of Muslim residents was higher than the borough average. 2,660 residents in the ward explicitly stated that they had no religion, this equated to 21.1 per cent of the ward population, compared to the borough average of 19.1 per cent. There were just over 2,000 residents in the ward who did not state their religion on the census form – accounting for 16 per cent of the ward’s population, higher than the borough average.</p> <p>The proportion of residents who identified themselves as Christian was 24.7 per cent. At just over 30 per cent of the population, the proportion of Muslim residents was lower than the borough average. 3,251 residents in the Weavers ward explicitly stated that they had no religion, this equated to 25.2 per cent of the ward population, one of the highest proportions in the borough.</p>
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In both phases of the consultation we identified residents from groups that could be impacted by this proposal. These actions included the following:

- We wrote to all faith communities including mosques and churches in the area encouraging them to cascade the information about the consultation and how to engage with their members.
- Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place;
- Letters were written to all residents listed on the Council Tax Register as living in the area;
- Letters/emails were sent to all faith community and voluntary organisations/community groups
- Fliers were produced in both English and Bangladeshi and were available at various locations in the area.
- Fliers and posters were produced and distributed to locations in and around the area.
- Local residents were employed as community researchers to engage on a face- to -face basis encouraging people to participate in the consultation. Researchers were instructed to stand outside of places of worship to target those residents and encourage them to participate in the consultation.
- Pull up banners were printed and displayed around the borough including at places at worship to inform people about the consultation and encourage them to participate or ask questions if they required further information.
- A special email address was created so that residents could directly request further information about the consultation when required.

During phase two of those who responded to the equality monitoring question about faith or belief giving their religion as Muslim, 91.2% were opposed to the creation of a parish council. There is significant overlap between those who gave their religion as Muslim and those who gave their ethnicity as Asian/Asian British: Bangladeshi. Please see that section above for details.

Data on the religion or belief of phase two consultation responders compared with the 2011 census is shown in the tables below.

Responders by religion	Grand Total	Responders from within Parish Boundary Options
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	Number	%	Number	%
Total	2173	100.0%	1239	100
Prefer not to say	509	23.5%	368	29.8%
<i>Responses from</i>				
Buddhist	5	0.3%	1	0.1%
Christian	160	9.5%	86	9.6%
Hindu	8	0.5%	4	0.5%
Jewish	10	0.6%	6	0.7%
Muslim	1174	70.6%	610	70.1%
No religion	269	17.5%	145	17.8%
Other religion	38	1.0%	19	1.3%
Total responders answering the question	2173	100.0%	1239	100.0%

Census Data by religion	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
All categories: Religion	254,096	100.0%	12770	100.0%
Buddhist	2,726	1.1%	2473	19.4%
Christian	68,808	27.1%	78	0.6%
Hindu	4,200	1.7%	151	1.2%
Jewish	1,283	0.5%	95	0.7%
Muslim (Islam)	87,696	34.5%	4727	37.0%
Sikh	821	0.3%	36	0.3%
Other religion: Total	825	0.3%	42	0.3%
No religion: Total	48,648	19.1%	3019	23.6%
Religion not stated	39,089	15.4%	2149	16.8%

<p>Age</p>	<p>No adverse impacts related to age have been identified</p>	<p>The Borough Profile 2017/18 identified that Tower Hamlets has the 4th youngest population in the UK with almost half of residents (46%) being aged between 20 – 39. This is consistent with Census 2011 data which identified that the majority of residents in Spitafields/Banglatown and Weavers Wards are under the age of 44 with these numbers being 81.4% and 81.4% respectively.</p> <p>Prior to the consultation we identified residents from groups that could be impacted by this proposal. These actions included the following:</p> <ul style="list-style-type: none"> • Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place; • Letters were written to all residents listed on the Council Tax Register as living in the area; • Letters/emails were sent to all faith community and voluntary organisations/community groups . • Fliers were produced in both English and Bangladeshi and were available at various locations in the area. • Fliers and posters were produced and distributed to locations in and around the area. • Local residents were employed as community researchers to engage on a face to face basis encouraging people to participate in the consultation. Researchers were instructed to locate themselves around schools and youth facilities to capture different age groups. • Pull up banners were printed and displayed around the borough including at places at worship to inform people about the consultation and encourage them to participate or ask questions if they required further information. • A special email address was created so that residents could directly request further information about the consultation when required. <p>In phase two 3 almost a third of responders did not provide their age. Of those who did, the age group 25-34 was significantly under represented in the responses. Age groups 50 to 64 and 65+ were significantly over represented. Of those who supported the creation of a parish council, levels of support were fairly evenly distributed across the age range. Opposition was also fairly evenly distributed across the age range, with slightly higher levels of opposition in those under 55.</p> <p>Tables showing phase two responses by age compared with the 2011 census are below</p>
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Responders by Age	Grand Total		Responders from within Parish Boundary Option Area	
	Number	%	Number	%
Total	2173	100%	1246	100%
Blank / Prefer not to say	625	28.8%	400	32.1%
<i>Responses from</i>				
0-15	18	1.2%	15	1.8%
16-24	126	8.1%	86	10.3%
25-34	317	20.5%	184	21.9%
35-44	382	24.7%	188	22.4%
45-54	313	20.2%	148	17.6%
55-64	246	15.9%	130	15.5%
65+	146	9.4%	88	10.5%

Census Data by Age	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
All categories: Age	254,096	100%	12770	100%
Age 0 to 15	50,143	19.7%	1704	13.34%
Age 16 to 24	42,781	16.8%	2642	20.69%
Age 25 to 34	73,185	28.8%	4430	34.69%
Age 35 to 49	48,995	19.3%	2209	17.30%
Age 50 to 64	23,422	9.2%	1131	8.86%
Age 65 and over	15,570	6.1%	654	5.12%

Marriage and Civil Partnerships.

No adverse impacts have been identified related to marriage or civil partnership

The steps taken to ensure that information was made available to the protected characteristics as part of the consultation process as outlined below:

- Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place;
- Letters were written to all residents listed on the Council Tax Register as living in the area;
- Letters/emails were sent to all faith community and voluntary organisations/community groups (including LGBTQ organisations and those providing services to LGBTQ residents).
- Fliers were produced in both English and Bangladeshi and were available at various locations in the area.
- Fliers and posters were produced and distributed to locations in and around the area.
- Local residents were employed as community researchers to engage on a face to face basis encouraging people to participate in the consultation.
- Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information.
- A special email address was created so that residents could directly request further information about the consultation when required.

Response and census 2011 data for relationship status is outlined below.

Responders by relationship status	Grand Total		Responders from within Parish Boundary Options	
	Number	%	Number	%
Total	2173	100.0%	1239	100.0%
Prefer not to say	738	34.0%	461	37.2%
<i>Responses from</i>				
Civil partnership	16	1.1%	5	0.6%
Cohabiting	76	5.3%	44	5.7%
Married	984	68.6%	511	65.7%
Single	359	25.0%	218	28.0%
All responders answering the question	1435	100.0%	778	100.0%

Census Data by relationship status	ALL LBTH		Parish Boundary Options	
	Number	%	Number	%
All categories: Living arrangements	200,214	100%	10215	100%
Living in a couple: Married	56,616	28.3%	2388	23.4%
Living in a couple: Cohabiting (opposite-sex)	20,651	10.3%	1094	10.7%
Living in a couple: In a registered same-sex civil partnership or cohabiting (same-sex)	3,986	2.0%	223	2.2%
Not living in a couple: Single (never married or never registered a same-sex civil partnership)	89,494	44.7%	5219	51.1%
Not living in a couple: Married or in a registered same-sex civil partnership	6,964	3.5%	367	3.6%
Not living in a couple: Separated (but still legally married or still legally in a same-sex civil partnership)	5,492	2.7%	209	2.0%
Not living in a couple: Divorced or formerly in a same-sex civil partnership which is now legally dissolved	9,732	4.9%	372	3.6%
Not living in a couple: Widowed or surviving partner from a same-sex civil partnership	7,279	3.6%	343	3.4%

Pregnancy and Maternity	No adverse impacts have been identified related to pregnancy and maternity	<p>There is no readily available data to help inform us of this protected characteristic. We do however believe that the necessary steps were taken to ensure that information was made available to this protected characteristic as part of the consultation process as outlined below.</p> <p>Prior to the consultation we identified residents from groups that could be impacted by this proposal. These actions included the following:</p> <ul style="list-style-type: none"> • Online engagement including social media posts and tweets about the consultation to raise awareness of the proposal and consultation taking place; • Letters were written to all residents listed on the Council Tax Register as living in the area; • Letters/emails were sent to all faith community and voluntary organisations/community groups (including LGBTQ organisations and those providing services to LGBTQ residents). • Fliers were produced in both English and Bangladeshi and were available at various locations in
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		<p>the area.</p> <ul style="list-style-type: none">• Fliers and posters were produced and distributed to locations in and around the area.• Local residents were employed as community researchers to engage on a face to face basis encouraging people to participate in the consultation.• Pull up banners were printed and displayed around the borough to inform people about the consultation and encourage them to participate or ask questions if they required further information.• A special email address was created so that residents could directly request further information about the consultation when required. <p>There is no specific information relating to whether survey respondents are pregnant or have maternity status however the necessary steps were taken to include everyone. Information on the consultation was made available in a number of locations likely to be used by people with this protected characteristic including GP surgeries, hospitals, and health centres in order to increase the awareness of the consultation and encourage participation by those who are pregnant or on maternity leave.</p>
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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 or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes

Potential adverse impacts have been identified in relation to ethnicity and religion/belief.

During phase one, campaigners supporting a parish council themselves identified the importance of the name 'Banglatown' to the Bangladeshi community to the area. They proposed that the name of any future parish should be 'Spitalfields & Banglatown' as a potential way of mitigating negative perceptions of the proposal in the Bangladeshi community. The Council accepted this proposal as a potential mitigating actor and put this forward in the phase two consultation document. A number of objections to inclusion of Banglatown in the name were received. Inclusion of the new name did not appear to increase support for the proposal within the Bangladeshi community.

Following concerns that the boundaries proposed by petitioners would divide communities the Council put forward boundaries that it believed better balanced the various community identities in the area. This again was in response to feedback from campaigners for a parish council. This mitigating action did not appear to reduce opposition to the proposal from those concerned about division of communities along the lines of socio-economic status.

In terms of alternative options government guidance is clear that if a principal council believes that creating a parish would damage community cohesion then it should not create a parish. The Council also put forward the option of establishing new (non-parish) forms of community governance. This proposal, although the Council's favoured option, did not receive support during consultation.

Consultation has identified perceptions of division within the area based on socio-economic status. To some extent this is confirmed by the data in the Borough Profile 2018. There is also the potential for division to arise in relation to ethnicity and religion. Whether or not a parish / parish council is established it is important to better understand the impact of gentrification on the area and also the integration of communities linked to ethnicity and religion. There may also be work needed on how to increase the civic and democratic engagement of women, especially ethnic minority women. It is recommended that Tower Hamlets Council undertakes further work to explore these issues. This could assist a parish council, if established, or other institutions in the area in terms of promoting social integration and community cohesion.

Section 5 – Quality Assurance and Monitoring

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

NO

At this stage the proposal to create a parish council has not been adopted. If, as requested by campaigners, a final decision is determined by the outcome of a local referendum then it would not be possible to monitor responses in relation to protected characteristics. If a majority supported the creation of a parish at referendum it would not be possible to determine whether the proposal had the support of a broad cross section of the community. Furthermore, a

decision made to create a parish which disregarded consultation findings and relied solely on a referendum or ballot could be challenged by those opposed to the creation of a parish.

Does the policy/function comply with equalities legislation?

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

YES A community governance review is a process governed by statute. The Council has complied with its statutory duty to consult with local government electors and others with an interest. It has taken into account the Public Sector Equality Duty in making its final recommendation. In relation to this proposal the Council should have due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Government guidance gives a working definition of this as 'the growth of relations and structures that acknowledge the diversity of society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms'.¹⁹ Of particular relevance is the need to consider whether a parish council would be likely to increase diversity in civic and political participation and increase reported confidence and trust in institutions subject to the duty. In reaching its decision, the Council is also required to have regard to the need to advance equality of opportunity. Of particular relevance is the requirement to encourage participation in public life.

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

The Council notes the argument put forward by campaigners for a parish council that there is little concrete evidence that parish councils elsewhere in the country have had a negative impact on community cohesion. (Conversely there is also no robust evidence that they have a positive impact.) Whilst government guidance is enthusiastic about the potential benefits of parishes for community cohesion, it also clearly states that a council should decline to set up such community governance arrangements where they judge that doing so would not be in the interests of either the local community or surrounding communities, or where the effect would be likely to damage community cohesion.²⁰ Government guidance on this matter recognises that challenges to community cohesion are very local and that local authorities because of their knowledge of local communities are in a good position to assess these challenges.²¹ Particular issues relating to consultation findings are identified above.

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

Not applicable

¹⁹ Equality Act 2010: Technical Guidance on the Public Sector Equality Duty: England. Equality & Human Rights Commission 2014. 3.35

²⁰ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.74

²¹ Guidance on Community Governance Reviews. DCLG & LGBCE 2010 s.76




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
Ensure that people are able to respond to consultation through a wide range of channels	Design and delivery of consultation information. Consultation events, static displays, outreach.	Monthly review by CGR steering group	Steve Morton / Kerry Middleton	Complete
Production of consultation information	Universal and targeted information including material suitable for people whose first language is not English and people with sensory impairment	Review at start of consultation period and half way point	Kerry Middleton	Complete
Collect and report data on protected characteristics of respondents	Design and administration of response monitoring	Monthly review by CGR steering group	Vicky Allen	Complete
Prepare data – qualitative and quantitative – for equality analysis	Discuss findings of initial and final equality analysis with officers and members	Review by officer group and inclusion in papers to relevant committees	Janette John / Steve Morton	Complete
Prepare initial and final analysis reports	Reports to officer and member steering groups, CLT, GPC, Full Council	At end of phase one and phase two	Steve Morton	In progress

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: 