

# Equality Analysis (EA)

Financial Year  
**2020/21**

## Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose

*(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, strategy or project)*

In April 2019, The Mayor requested a review of the Tower Hamlets Community Language Service and asked that a number of options in order to “continue the provision of community languages in Tower Hamlets with a high-quality and sustainable teaching model delivered in a more cost-effective manner”. The objective of the review was to continue the provision of community languages in Tower Hamlets with a high-quality and sustainable teaching model delivered in a more cost-effective manner.

This EA considers the impact on children and the wider community in relation to four options as laid out in the paper to Cabinet:

**Option1-** a standard offer by LBTH with reduced hours/classes/terms (exact variable to be decided if this option is taken)

**Option 2 -** Close the service but provide grant funding to providers for mother tongue classes

**Option 3-** Close the service and provide time limited tapered support to the voluntary sector for mother tongue classes

**Option 4 –** Close the service

All options would support providers to obtain a quality mark from the NRCSE (national body for supplementary education).

Note that a separate EA will be undertaken for the staff profile of the CLS.

See  
**Appendix A**

Current decision  
rating



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

*(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)*

**Name:** Judith St John, Divisional Director, Sport, Leisure and Culture  
(signed off by)

**Date signed off:** 14/11/2019  
(approved)

Service area:

Sports Leisure and Culture (Children and Culture Directorate)

Team name:

Community Language Service

Service manager:  
Simon Leveaux

Name and role of the officer completing the EA:  
Jonathan Solomons, Strategy and Policy Manager, Children & Culture  
Charlotte Saini, Strategy and Policy Manager, Children and Culture

## 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?

### 1. Evidence has been collected from the Service Manager and Team Manager of the CLS from the 19/20 enrolment data as follows:

- Number of children using the current service (approx. 1400)
- Number of classes offered (103)
- Languages offered

Bengali	37 classes
Arabic	13
Lithuanian	5
Mandarin	5
Spanish	5
Cantonese	4
Russian	2
Urdu	2
Somali	2
Vietnamese	2

- Ages of children (primarily 5-11 but with around 235 older children and 10 under 5s)
- Locations of the provision
- Hours of provision

*It should be noted that enrolment data from providers does not collect information on either ethnicity or disability.* The languages offered are primarily mother-tongue languages which would presume an ethnic heritage connection, so for example a child attending a Bengali class would usually have Bengali heritage.

### 2. Evidence of the languages offered at secondary school has been collated

All schools a modern foreign language at GCSE as per their statutory requirements. A number of schools go further than this and do offer additional languages, including community languages. However, when these additional languages are offered, these are not always pathways to a qualification.

### **3. Qualitative evidence of how the current service supports the current users and their wider family, gathered from consultations with providers and parents of children attending.**

A number of consultation events have taken place over two separate days. Two sessions were held for the organisations that provide these classes one at Whitechapel Idea Store and one at Bow Idea Store. These sessions were attended by a total of 15 different organisations, 14 who represented Bengali classes and one who represented a Lithuanian class. A presentation was delivered which outlined the current way that the classes operate as well as the principles that were being used to develop a model going forward. All providers were written to and those who were unable to attend were sent the presentation and invited to ask any questions or provide comments.

Participants were given an opportunity to share some of their thoughts on a set of principles and made a number of observations

These classes are clearly valued and those who provide them wish for them to continue as currently.

There was an understanding that the location of classes was not currently correct and hadn't changed as demographics of the borough did. There are lower attendances in the west of the borough whereas some classes in the east have waiting lists<sup>1</sup>.

Those who provide these classes see them as a way of ensuring the children who attend are safe and engaging in appropriate activities. The variability in the quality of teaching was discussed but this did not present as a significant priority.

There was some support for the idea of a standardised offer, however the view was that this should be set at four hours not two.

Two similar sessions were run with parents. Over 80 parents attended across the sessions. The sessions took the same approach as those for providers with a presentation delivered and the opportunity for attendees to ask questions and offer their thoughts.

- Those parents who attended clearly valued the classes.
- The primary reason was the connection that these afford with their culture and heritage.
- Many parents also commented on the fact that these classes supported their children to communicate with older members of the family who did not speak English.
- There was some discussion of the positive benefits of language acquisition and bilingualism but this did not seem to be a primary motivation for most parents.
- Some parents did seem to place emphasis on the quality of the provision although many accepted that variability was to be expected.
- There was an understanding for the need to consider the location of the classes, particularly to ensure their viability however most would not be keen to travel very far to attend.

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<sup>1</sup> The classes advising that they had waiting lists are as follows (and have been asked to provide a copy of their waiting list to the CLS):

1. Poplar Community Language School based at Chrisp St IS (advised 12 in waiting list)
2. Whitechapel IS (advised 15-20 in waiting list)
3. Bow Bengali Forum (advised 5 in waiting list)
4. Redcoat Community Centre (advised 15 in waiting list)
5. Wapping Women's Centre (advised 10 in waiting list)
6. CISTH (advised 30 – 40 in waiting list)

## Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

**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

Target Groups	Impact – Positive or Adverse  What impact will the proposal have on specific groups of service users or staff?	Reason(s) <ul style="list-style-type: none"><li>• Please add a narrative to justify your claims around impacts and,</li><li>• Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making</li></ul> Please also how the proposal will promote the three One Tower Hamlets objectives? <ul style="list-style-type: none"><li>-Reducing inequalities</li><li>-Ensuring strong community cohesion</li><li>-Strengthening community leadership</li></ul>
Race	Negative and positive	No data is collected on ethnicity, however children attending classes are primarily attending classes in their mother-tongue so it could be inferred that the majority of children attending are therefore from BAME backgrounds, with the largest two backgrounds being Bengali followed by backgrounds speaking Arabic.  Reducing the service will have a negative impact on children from BAME backgrounds who would otherwise have accessed a language in their mother-tongue. However, if the quality of the service improves as a result of the restructuring of it, then those children who are still accessing classes will have an improved experience.  Currently the perception from parents of children attending the supplementary schools is that they are a safe place to go after school. Reducing or changing the service could mean that parents from the ethnic groups accessing the service feel this is no longer the case
Disability	Unclear	No data is collected around disabilities.
Gender	None	The proposal is unlikely to negatively affect one gender more than another as there is roughly an even split between males and females.
Gender Reassignment	None	There is no evidence collected around gender reassignment as the service users are primarily children aged 5-11
Sexual Orientation	None	There is no evidence collected around sexual orientation as the service users are primarily children aged 5-11
Religion or Belief	Negative and/or positive	There is no evidence collected around religion, however it is known that the majority of children attend Bengali classes, and that this language is their mother tongue. Therefore it is likely that a large proportion would class themselves as Muslims, and the reduction of classes would therefore have a

		bigger adverse impact on this group than say Christians. Conversely if the service increases in quality then there will be a positive impact for those accessing
Age	Negative and/or positive	<p>Reducing the service will have a negative impact on children age 5-11 who would otherwise have accessed a language in their mother-tongue. However, if the quality of the service improves as a result of the restructuring of it, then those children who are still accessing classes will have an improved experience.</p> <p>If the service is withdrawn completely from secondary school age children then it could be argued there is a negative impact on them. However, modern foreign languages are now taught in all secondary schools and many also give the opportunity to young people to take GCSEs in a local community language such as Bengali or Arabic so they could access language this way</p>
Marriage and Civil Partnerships.	None	The proposed changes to this service will not affect marriage and civil partnerships
Pregnancy and Maternity	None	The proposed changes to this service will not affect marriage and civil partnerships
Other Socio-economic Carers	negative	Charging for the service could negatively impact on those from a lower socioeconomic background, however this could be mitigated by ensuring classes are free to those who cannot afford them. Sibling discounts could also be offered.

## 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? ☒ 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.)*

All options will lead to changes in the service which due to its nature will impact on protected groups. All of the options propose that some form of the service continues which will mitigate the impact to some degree. However options 2 and 3 propose that the responsibility for delivery of the classes will no longer sit with the local authority, this means that it will be more difficult to guarantee the availability of the service. This service is non-statutory and the existing model is not the one used in most other local authorities. The main driver for the review was financial and this service along with all other non-statutory functions will need to be reviewed in line with the medium term financial plan and the duty to deliver a balanced budget. The quality of the provision is not universally good which means that a large number of service users are already not receiving as much benefit as would be expected.

*Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.*

## Section 5 – Quality Assurance and Monitoring

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

Yes? ☒ No? ☐

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

Depending on which option is agreed, there will be different quality assurance mechanisms. Should either option 2 or 3 be agreed, any funding provided by the local authority in the form of a grant will be subject to close monitoring and ensuring that recipients comply with their equality duty can and should be part of this.

## 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
<b>Example</b>				
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



## 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.	<b>Suspend – Further Work Required</b>	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.	<b>Further (specialist) advice should be taken</b>	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.	<b>Proceed pending agreement of mitigating action</b>	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.	<b>Proceed with implementation</b>	Green: 